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CONTINUED DEPOSITION OF GERALD DAVID  
ARMSTRONG, A DEFENDANT, TAKEN ON BEHALF  
OF THE PLAINTIFF, AT 1821 WILSHIRE  
BOULEVARD, SUITE 210, SANTA MONICA,  
CALIFORNIA 90403, COMMENCING AT  
10:45 A.M., WEDNESDAY, AUGUST 18, 1982,  
BEFORE GREGORY R. ADELSON, CSR NO. 1873,  
RPR, NOTARY PUBLIC, PURSUANT TO NOTICE  
OF TAKING DEPOSITION.

APPEARANCES OF COUNSEL:

FOR PLAINTIFF:

GREY AND KOHLWECK  
BY: CARL E. KOHLWECK  
1821 WILSHIRE BOULEVARD  
SUITE 210  
SANTA MONICA, CALIFORNIA 90403  
-AND-  
LENSKE, LENSKE, HELLER & MAGASIN  
A LAW CORPORATION  
6400 CANOGA AVENUE  
WOODLAND HILLS, CALIFORNIA 91367  
(NOT PRESENT AT DEPOSITION)

FOR DEFENDANT ARMSTRONG:

CONTOS & BUNCH  
BY: JULIA DRAGOJEVIC  
5855 TOPANGA CANYON BOULEVARD  
SUITE 400  
WOODLAND HILLS, CALIFORNIA 91367

ALSO PRESENT:

REBECCA CHAMBERS

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I N D E X

<u>WITNESS</u>	<u>EXAMINATION</u>	<u>PAGE</u>
GERALD DAVID ARMSTRONG	BY MR. KOHLWECK	133

EXHIBITS FOR IDENTIFICATION

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UNANSWERED QUESTIONS

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1  
2 MR. KOHLWECK: WOULD YOU RESWEAR THE WITNESS, PLEASE.

3  
4 GERALD DAVID ARMSTRONG,  
5 THE WITNESS HEREIN, HAVING BEEN DULY RESWORN, DEPOSED AND  
6 TESTIFIED FURTHER AS FOLLOWS:

7  
8 EXAMINATION (RESUMED)

9 BY MR. KOHLWECK:

10 Q MR. ARMSTRONG, TODAY IS A CONTINUATION OF  
11 YESTERDAY'S DEPOSITION. ONE OTHER ADMONITION I WOULD LIKE  
12 TO ADD THIS MORNING IS, BECAUSE WE ARE IN MY LAW OFFICES  
13 HERE AND IN A CONFERENCE ROOM DOESN'T MEAN THAT YOU  
14 SHOULDN'T VIEW TODAY'S PROCEEDING WITH ANY LESS SOLEMNITY  
15 AS YOU WOULD VIEW A PROCEEDING IN A COURT OF LAW. BASICALLY  
16 A DEPOSITION IS JUST AS THOUGH WE WERE BEFORE A JUDGE IN A  
17 COURT PROCEEDING, ALTHOUGH THE JUDGE ISN'T HERE. THAT IS  
18 THE ONLY DIFFERENCE. I JUST WANT TO POINT THAT OUT TODAY.  
19 IT IS TESTIMONY TAKEN UNDER OATH AND CAN BE USED FOR A  
20 VARIETY OF PURPOSES.

21 BEFORE WE START TODAY, MR. ARMSTRONG, DO YOU HAVE  
22 ANY QUESTIONS FROM YESTERDAY'S PROCEEDINGS?

23 A I DO NOT THINK SO.

24 Q YESTERDAY YOU MENTIONED THE NAME DON PARSONS.  
25 WHO IS DON PARSONS?

26 A I DON'T KNOW A DON PARSONS.

27 Q PERHAPS I HAVE THE NAME WRONG. WAS IT DON  
28 PURCELL?

1 A DON PURCELL.

2 Q COULD YOU REFRESH MY MEMORY AS TO WHO THAT  
3 PERSON IS?

4 A DON PURCELL WAS A -- HE WAS THE DIRECTOR OF THE  
5 DIANETICS OPERATION IN WICHITA, KANSAS. HE WAS THE PERSON  
6 WHO BROUGHT L. RON HUBBARD THERE FROM CUBA.

7 Q NOW, WHEN YOU SAY HE BROUGHT L. RON HUBBARD THERE  
8 FROM CUBA, WHAT DO YOU MEAN BY THAT STATEMENT?

9 A HE SENT A PLANE TO PICK HIM UP.

10 Q DO YOU KNOW FOR WHAT PURPOSE HE BROUGHT  
11 MR. HUBBARD TO WICHITA?

12 A TO GIVE SOME LECTURES.

13 Q WHAT WERE THOSE LECTURES, IF YOU KNOW?

14 A NO, I DON'T.

15 Q DO YOU KNOW ANYTHING ELSE ABOUT MR. PURCELL?

16 A YES.

17 Q WHAT IS THAT?

18 A HE WAS AN EXECUTIVE ON THE BOARD OF OMEGA OIL.

19 Q DO YOU KNOW WHAT TIME PERIODS HE WAS AN  
20 EXECUTIVE ON THE BOARD OF OMEGA OIL?

21 A NO, BUT I KNOW HE WAS IN 1951, AT LEAST.

22 Q DID YOU EVER INTERVIEW MR. PURCELL AS PART OF  
23 YOUR DUTIES AS THE ARCHIVIST WITH THE CHURCH OF SCIENTOLOGY?

24 A NO.

25 Q DID YOU EVER EXCHANGE CORRESPONDENCE WITH HIM?

26 A NO.

27 Q WHAT I WOULD LIKE TO DO IS SPEND A FEW MINUTES  
28 NOW TALKING ABOUT YOUR DUTIES AND RESPONSIBILITIES AS THE

1 ARCHIVIST. AND RATHER THAN GIVING AN ELABORATE DESCRIPTION --  
2 DO YOU UNDERSTAND WHAT I MEAN BY SIMPLY REFERRING TO AS  
3 THE ARCHIVIST, OR DO YOU WANT ME TO DEFINE THAT A LITTLE  
4 BIT?

5 A NO, THAT IS FINE.

6 Q WE WILL BE TALKING ROUGHLY ABOUT THE PERIOD  
7 BETWEEN JANUARY OF 1980 AND DECEMBER OF 1981.

8 CAN YOU DESCRIBE YOUR FILES IN THE ARCHIVES?  
9 DID YOU HAVE A SET SYSTEM THAT YOU USED THERE?

10 A IT WAS SET TO SOME DEGREE IN THAT I LABELED FILES  
11 AND FILED THINGS ACCORDING TO CATEGORY.

12 Q WAS THERE SOME MASTER TABLES OF THE CATEGORY  
13 THAT YOU WERE FILING THINGS WITHIN?

14 A NO.

15 Q AS BEST YOU CAN, CAN YOU DESCRIBE THE CATEGORIES  
16 AS YOU ESTABLISHED THEM?

17 A OKAY. THERE WERE LETTERS BETWEEN L. RON HUBBARD  
18 AND HIS FIRST WIFE; LETTERS BETWEEN L. RON HUBBARD AND HIS  
19 SECOND WIFE; LETTERS BETWEEN L. RON HUBBARD AND HIS THIRD  
20 WIFE; THERE WAS A NAVAL PERIOD, DOCUMENTS, CORRESPONDENCE;  
21 THERE WAS CORRESPONDENCE WITH AGENTS AND PUBLISHERS; THERE  
22 WERE FILES FOR CLOSE FRIENDS; THERE WERE FILES OF MANUSCRIPTS;  
23 THERE WAS FILES OF POETRY; THERE WERE FILES OF AWARDS;  
24 THERE WERE INDIVIDUAL FILES ON PERHAPS MANY THINGS WITHIN  
25 THOSE CATEGORIES; THERE WERE FILES FOR CORRESPONDENCE WITH  
26 HIS VARIOUS FAMILY MEMBERS -- COUSINS, AUNTS, UNCLES,  
27 FATHER, MOTHER, CHILDREN; THERE WAS FILES OF BOY SCOUT  
28 INFORMATION, MEMORABILIA; THERE WERE FILES FROM SAINT HILL

1 REFERRING TO HIS PURCHASE OF SAINT HILL; THERE WERE FILES  
2 DEALING WITH PHOTOGRAPHY; THERE WERE FILES DEALING WITH HIS  
3 EDUCATION.

4 Q WERE THERE SOME FILES --

5 I'M SORRY. GO AHEAD.

6 A YOU GO AHEAD. THAT IS WHAT COMES TO MIND RIGHT  
7 NOW.

8 Q WERE THERE ALSO SOME FILES CONCERNING HIS BIRTH  
9 AND EARLY UPBRINGING IN BREMER, B-R-E-M-E-R, COUNTY OF  
10 MONTANA?

11 A NO. THERE WERE FILES FROM HELENA, MONTANA.  
12 THERE WERE GENEALOGY FILES.

13 Q AND THAT WOULD COMPRISE THE DE WOLFE FAMILY AND  
14 SOME OF THE EARLY ANCESTORS AND MR. HUBBARD AND HIS  
15 FAMILY?

16 A YES.

17 Q WERE THERE ANY DIARIES INCLUDED IN THE  
18 COLLECTION THAT YOU CAN RECALL?

19 A YES.

20 Q WERE THESE SEPARATELY SET UP INTO DIFFERENT  
21 CATEGORIES OR DID YOU HAVE THESE CHARACTERIZED AS JUST  
22 DIARIES?

23 A AT LEAST SOME OF THEM I LABELED AS TO THE YEAR.

24 Q DID YOU READ ANY OF THOSE DIARIES?

25 A YES.

26 Q DO YOU RECALL ONE CALLED THE "ASIA DIARY"?

27 A YES.

28 Q I BELIEVE IN YOUR AFFIDAVIT -- AND WE WENT THROUGH

1 IT YESTERDAY -- IN PARAGRAPH 8 OF, I THINK IT WAS, PLAINTIFF'S  
2 EXHIBIT 3 APPEARS THE STATEMENT THAT A LOT OF MR. HUBBARD'S  
3 CLAIMS OF BEING AN EXPLORER WERE FALSE.

4 A THAT IS TRUE.

5 Q DID YOU FIND THAT THE ASIA DIARY, FOR INSTANCE,  
6 PROVED THE FALSEHOOD OF HIS STATEMENTS OR SUBSTANTIATED HIS  
7 CLAIMS THAT HE HAD BEEN TO ASIA ON EXPEDITIONS AND WHATNOT?

8 A I WOULD HAVE TO SEE HIS CLAIMS AT THIS TIME,  
9 BUT I DO BELIEVE THAT.

10 Q DO BELIEVE WHICH, MR. ARMSTRONG?

11 A THAT THEY SHOWED THAT AT LEAST SOME OF THE CLAIMS  
12 WERE FALSE.

13 Q DOES IT ALSO SHOW THAT HE ACTUALLY WAS IN ASIA,  
14 THOUGH, AROUND 1928?

15 A YES.

16 Q NOW, YESTERDAY I BELIEVE WE TALKED AS A PASSING  
17 REFERENCE ONLY SOMETHING ABOUT THE MINERALOGICAL SURVEY.

18 DO YOU RECALL THAT?

19 A YES.

20 Q DID YOU HAVE A FILE SET UP ON THE PUERTO RICO  
21 EXPEDITION?

22 A YES.

23 Q DID YOU REVIEW THAT MATERIAL IN THAT FILE?

24 A YES.

25 Q WHAT DID YOU FIND FROM YOUR REVIEW OF THAT FILE,  
26 IF YOU CAN RECALL?

27 A THAT HIS CLAIM OF HAVING DONE THE FIRST COMPLETE  
28 MINERALOGICAL SURVEY OF PUERTO RICO WAS FALSE.

1 Q HOW WAS IT FALSE, IF YOU CAN RECALL?

2 A HE DID NOT DO A COMPLETE MINERALOGICAL SURVEY OF  
3 PUERTO RICO.

4 Q DID HE DO ANY SORT OF MINERALOGICAL SURVEY OF  
5 PUERTO RICO?

6 A YES.

7 Q IS THE FALSENESS THEREFORE IN THE USE OF THE  
8 WORD "COMPLETE" OR IN THE USE OF THE PHRASE "MINERALOGICAL  
9 SURVEY"?

10 A USE OF THE WORD "FIRST" AND USE OF THE WORD  
11 "COMPLETE."

12 Q DO YOU HAVE ANY INFORMATION AS TO HOW EXTENSIVE  
13 HIS SURVEY WAS IN PUERTO RICO?

14 A I DON'T RECALL AT THE MOMENT; HOWEVER, I DID  
15 SEE CORRESPONDENCE FROM THAT PERIOD WHEN HE WAS IN PUERTO  
16 RICO, AND IT INDICATED A RELATIVELY SMALL SURVEY.

17 Q BUT IN FACT A SURVEY DID TAKE PLACE?

18 A YES, IT DID.

19 Q ARE YOU FAMILIAR WITH SOMETHING CALLED THE  
20 ALASKAN EXPEDITION OR THE COASTAL SURVEY?

21 A YES.

22 Q IS THAT PART OF THE SURVEY YOU REVIEWED OR HAD  
23 CUSTODY OF?

24 A YES.

25 Q DID YOU REVIEW THAT SURVEY?

26 A YES.

27 Q DID MR. HUBBARD IN FACT CONDUCT AN ALASKAN  
28 SURVEY, TO THE BEST OF YOUR KNOWLEDGE?



1 A I DON'T KNOW.

2 Q DOES THAT MEAN YOU CAN'T RECALL OR YOU HAVE NEVER  
3 KNOWN?

4 A I DON'T KNOW IF HE DID AN ALASKAN SURVEY.

5 Q WERE THERE ALSO TIME TRACKS INCLUDED WITHIN THE  
6 ARCHIVES CONCERNING DIANETICS AND SCIENTOLOGY?

7 A YES.

8 Q WHAT WERE THOSE TIME TRACKS ABOUT, BASICALLY,  
9 AS YOU RECALL THEM?

10 A THEY WERE TIME TRACKS OF WHAT MR. HUBBARD WAS  
11 DOING AT CERTAIN PERIODS OF TIME, WHERE HE WAS, WHAT  
12 LECTURES HE WAS GIVING, WHAT HE WAS WORKING ON RELATIVE TO  
13 DIANETICS OR SCIENTOLOGY AT THAT TIME.

14 Q IN YOUR SUPERVISION OF THE ARCHIVES, DID YOU  
15 EVER COME ACROSS ANY DOCUMENTS CONCERNING MR. HUBBARD'S  
16 APPLICATION TO THE EXPLORERS CLUB OF NEW YORK?

17 A YES.

18 Q CAN YOU RECALL THOSE DOCUMENTS SPECIFICALLY  
19 TODAY?

20 A NO. I WOULD HAVE TO SEE THE DOCUMENT AGAIN.

21 Q CAN YOU RECALL IF YOU HAD SEEN AN APPLICATION OF  
22 MR. HUBBARD'S TO THE SOCIETY AND THEIR ACCEPTANCE OF HIS  
23 APPLICATION?

24 A YES, I BELIEVE SO. I MAY HAVE SEEN A COPY.

25 Q FROM YOUR KNOWLEDGE, IS IT FACTUAL TO STATE THAT  
26 MR. HUBBARD WAS ACCEPTED AS A MEMBER OF THE EXPLORERS CLUB?

27 A YES.

28 Q DO YOU CLAIM THAT HE HAS MISREPRESENTED HIMSELF

1 AS FAR AS HIS MEMBERSHIP IN THE EXPLORERS CLUB IN ANY WAY?

2 A I DO RECALL GETTING THE IMPRESSION OF A  
3 MISREPRESENTATION; HOWEVER, I DON'T HAVE THE DOCUMENT BEFORE  
4 ME, SO I AM NOT ABLE TO SAY WHAT THE SPECIFIC OF THAT IS.

5 Q ARE YOU FAMILIAR WITH THE NAME HELEN O'BRIEN?

6 A YES.

7 Q WHO IS HELEN O'BRIEN?

8 A HELEN O'BRIEN WAS THE HEAD OF DIANETICS IN  
9 PHILADELPHIA IN THE EARLY FIFTIES.

10 Q I'M SORRY. I BELIEVE WE DID COVER THIS YESTERDAY.  
11 THAT WAS ON THE DOCTORATE COURSE.

12 A THAT IS WHERE HE DELIVERED THE PHILADELPHIA  
13 DOCTORATE LECTURES.

14 Q IF WE CAN GO BACKWARDS FOR A SECOND, HAVE YOU  
15 RETAINED COPIES OR PROVIDED COPIES TO OTHER PERSONS OF  
16 MR. HUBBARD'S APPLICATION TO THE EXPLORERS CLUB?

17 A I VERY LIKELY GAVE THAT TO MR. GARRISON.

18 Q DO YOU KNOW IF YOU HAVE SUBSEQUENTLY OBTAINED  
19 COPIES FROM MR. GARRISON?

20 MS. DRAGOJEVIC: DON'T GUESS, GERRY. ONLY IF YOU  
21 KNOW.

22 THE WITNESS: I DON'T RECALL.

23 Q BY MR. KOHLWECK: SAME QUESTIONS CONCERNING THE  
24 DATA IN THE MINERALOGICAL SURVEY FILE.

25 HAVE YOU EITHER RETAINED COPIES OR THE ORIGINALS  
26 OF MATERIALS OUT OF THAT FILE OR PROVIDED COPIES TO ANYONE  
27 OTHER THAN MR. GARRISON?

28 A I DON'T RECALL.

1 Q SAME QUESTION CONCERNING THE ASIA DIARY.

2 A I DON'T RECALL.

3 Q ONE OF THE FILES IN THE ARCHIVES OR PERHAPS  
4 MORE THAN ONE FILE CONCERNS MR. HARRY HUBBARD.

5 DO YOU KNOW WHO MR. HARRY HUBBARD IS?

6 A YES.

7 Q AND WHO WAS MR. HARRY HUBBARD?

8 A HE WAS THE FATHER OF MR. L. RON HUBBARD.

9 Q DO YOU RECALL IF YOU MADE COPIES OR RETAINED THE  
10 ORIGINAL MATERIALS OF ANYTHING CONTAINED IN THAT FILE OR  
11 FILES?

12 A NO.

13 Q BY YOUR "NO," DO YOU MEAN THAT YOU CAN'T RECALL  
14 OR "NO," YOU DID NOT KEEP COPIES OR ORIGINALS FROM THAT  
15 FILE?

16 A NO, I DID NOT. TO THE BEST OF MY KNOWLEDGE, I  
17 DID NOT.

18 Q YESTERDAY I BELIEVE WE TALKED ABOUT MR. FRANK  
19 DESSLER, D-E-S-S-L-E-R.

20 WAS THERE A FILE IN THE ARCHIVES CONCERNING  
21 MR. DESSLER?

22 A YES.

23 Q AND I BELIEVE YESTERDAY YOU IDENTIFIED THAT YOU  
24 HAD A LUNCH MEETING WITH MR. DESSLER?

25 A YES.

26 Q I CAN'T RECALL IF I ASKED YOU IF YOU OBTAINED  
27 ANY DOCUMENTS FROM MR. DESSLER AT ANY POINT IN TIME.

28 A YES, I DID.

1 Q WHAT DOCUMENTS WERE THOSE? WERE THOSE THE  
2 ORGANIZATIONAL CHARTS YOU TALKED ABOUT YESTERDAY?

3 A NO.

4 Q WHICH DOCUMENTS WERE THEY?

5 A IT WAS CORRESPONDENCE BETWEEN MR. DESSLER AND  
6 MR. HUBBARD. IT WAS A FEW PIECES OF EARLY DIANETICS  
7 MEMORABILIA WHICH HE HAD RETAINED FROM THAT PERIOD.

8 Q AND, TO THE BEST OF YOUR KNOWLEDGE AND  
9 RECOLLECTION, HAVE YOU EITHER KEPT ORIGINALS OR MADE COPIES  
10 OF ANY DOCUMENTS RETAINED IN THAT FILE OR FILES?

11 A NO.

12 Q "NO," YOU HAVE NOT?

13 A NO, I HAVE NOT.

14 Q ARE YOU FAMILIAR WITH A PERSON BY THE NAME OF  
15 RICHARD DE MILLE?

16 A YES.

17 Q WHO IS RICHARD DE MILLE?

18 A HE IS A WRITER WHO WAS CONSIDERED L. RON HUBBARD'S  
19 BEST FRIEND BACK IN THE EARLY FIFTIES.

20 Q WAS THERE A FILE MAINTAINED ON RICHARD DE MILLE  
21 AS PART OF THE ARCHIVES COLLECTION?

22 A YES.

23 Q WHAT WERE THE CONTENTS OF THAT FILE, TO THE BEST  
24 OF YOUR RECOLLECTION?

25 A THAT WAS A FILE OF CORRESPONDENCE BETWEEN  
26 MR. HUBBARD AND MR. DE MILLE AND MR. DE MILLE AND THE  
27 ORGANIZATION.

28 Q HAVE YOU OBTAINED COPIES OR KEPT ORIGINAL MATERIALS

1 FROM THAT FILE OR FILES?

2 A NO.

3 Q CAN YOU RECALL IF THE ARCHIVES COLLECTION RETAINED  
4 ANY MATERIALS OF SOMETHING CALLED A PURIFICATION RUNDOWN?

5 A NO, IT DID NOT.

6 Q OR CONCERNING NARCONON?

7 A THERE MAY HAVE BEEN.

8 Q CAN YOU RECALL IF THE ARCHIVES INCLUDED A  
9 COLLECTION OF MR. HUBBARD'S EARLY NON-FICTION WRITINGS?

10 A YES.

11 Q CAN YOU RECALL ANY OF THE MATERIALS CONTAINED  
12 WITHIN THAT FILE OR FILES?

13 A WHAT WAS THE --

14 Q MR. HUBBARD'S EARLY NON-FICTION WRITINGS.

15 A YES. THERE WERE MANUSCRIPTS, WHICH WERE GENERALLY  
16 ESSAYS WHICH HE HAD WRITTEN -- PUBLISHED OR NOT -- BUT  
17 WRITTEN FOR VARIOUS MAGAZINES.

18 Q WERE ANY OF THESE MANUSCRIPTS, TO THE BEST OF  
19 YOUR KNOWLEDGE, PROVIDED TO MR. GARRISON, THE NON-FICTION  
20 WRITINGS?

21 A WHAT DO YOU MEAN BY THAT?

22 Q WERE COPIES OF ANY OF THESE DOCUMENTS PROVIDED TO  
23 MR. GARRISON?

24 A YES.

25 Q CAN YOU RECALL WHICH ONES?

26 A "JAPAN HAS A RIGHT TO CHINA," "PREBATTLE  
27 CONDITIONING," THE OUTLINE OF A PLAN OF A BOOK TO BE WRITTEN  
28 ON THE DOMINICAN REPUBLIC. THERE WERE SEVERAL MORE.

1 Q LET'S SEE IF I CAN REFRESH YOUR MEMORY A LITTLE  
2 BIT.

3 WERE YOU FAMILIAR WITH A MANUSCRIPT CALLED  
4 "CITIES UNDER THE EARTH"?

5 A I BELIEVE SO. IT MAY NOT HAVE BEEN A COMPLETE  
6 MANUSCRIPT, BUT I DO RECALL THE TITLE.

7 Q DO YOU KNOW IF THAT WAS PROVIDED TO MR. GARRISON?

8 A I DON'T RECALL.

9 Q "FORTRESS IN THE SKY"?

10 A YES.

11 Q WAS THAT PROVIDED TO MR. GARRISON?

12 A YES.

13 Q A REPORT ON THE MOON BASE?

14 A YES.

15 Q ALSO PROVIDED TO MR. GARRISON?

16 A YES.

17 Q ENERGY NOTES?

18 A YES.

19 Q ALSO PROVIDED TO MR. GARRISON?

20 A YES.

21 Q "SURVIVAL UNDER FIRE"?

22 A YES.

23 Q AND THAT WAS PROVIDED TO MR. GARRISON?

24 A YES.

25 Q AND FINALLY "THE REDISCOVERY OF THE HUMAN SOUL"?

26 A YES.

27 Q AND THAT WAS PROVIDED TO MR. GARRISON?

28 A YES.

1 Q WHAT CAN YOU RECALL REGARDING "REDISCOVERY OF THE  
2 HUMAN SOUL"?

3 A I DON'T RECALL AT THIS TIME.

4 Q CAN YOU RECALL APPROXIMATELY WHEN THAT PIECE WAS  
5 WRITTEN?

6 A NO.

7 Q CAN YOU RECALL A COLLECTED SERIES OF WORKS CALLED  
8 "WILD BILL HICKOK"?

9 A YES.

10 Q WHAT WAS THAT ALL ABOUT?

11 A THAT WAS A SCREENPLAY. I BELIEVE, FROM MY  
12 RECOLLECTION, IT WAS A SCREENPLAY.

13 Q AND IT WAS BROKEN DOWN INTO A SERIES OF EPISODES,  
14 WAS IT NOT?

15 A I DON'T RECALL.

16 Q I BELIEVE AS PART OF YOUR AFFIDAVIT YOU STATED  
17 THAT MR. HUBBARD HAD FRAUDULENTLY STATED HE WAS A  
18 SCREENWRITER; IS THAT CORRECT?

19 A NO.

20 Q OR HAD MISSTATED THE EXTENT THAT HE WAS A  
21 SCREENWRITER?

22 A YES.

23 Q HOW IS IT THAT YOU BELIEVE HE HAS MISSTATED  
24 THOSE CREDENTIALS?

25 A THE CLAIM WAS MADE THAT HE HAD WRITTEN THE  
26 SCREENPLAY FOR THE "PLAINSMAN" AND ALSO THAT HE HAD DONE THE  
27 SCREENPLAY FOR "DIVE BOMBER."

28 Q HAD MR. HUBBARD MADE THAT REPRESENTATION OR HAD

1 OTHER PERSONS, IF YOU KNOW?

2 A MR. HUBBARD, AT LEAST ONE OF THEM.

3 Q HOW DID HE MAKE THAT REPRESENTATION TO YOU?

4 A HE STATED IT IN A DISPATCH.

5 Q WHAT FORM OF DISPATCH WAS THAT?

6 A THAT WAS A DISPATCH TO THE SAFE ENVIRONMENT  
7 FUND.

8 Q CAN YOU RECALL WHAT IT WAS HE SAID IN THAT  
9 DISPATCH?

10 A HE SAID THAT THE FACT WAS HE HAD -- HE HAD BEEN  
11 GIVEN, I BELIEVE IT WAS, \$10,000 FOR DOING THAT WORK AND  
12 THAT AT THE END OF THE WAR HE HAD USED THAT MONEY TO GO ON A  
13 CARIBBEAN CRUISE.

14 Q UPON WHAT FACTS DO YOU BASE YOUR CONCLUSION THAT  
15 THAT IS A MISSTATEMENT BY MR. HUBBARD?

16 A HIS NAME DID NOT APPEAR; ADDITIONALLY, HE CLAIMED  
17 TO THE VETERANS ADMINISTRATION THAT HE WAS BROKE AT THE  
18 END OF THE WAR. I SAW NO OTHER INDICATION THAT HE HAD HAD  
19 ANYTHING WHATSOEVER TO DO WITH IT. I CALLED THE MAKERS OF THE  
20 FILM AT THE TIME TO TRY TO ESTABLISH IF THERE WAS ANY RECORD  
21 WHATSOEVER.

22 Q BASED UPON YOUR KNOWLEDGE AND INFORMATION THAT  
23 YOU GAINED WHILE YOU WERE THE ARCHIVIST, DO YOU KNOW WHETHER  
24 MR. HUBBARD EVER WROTE UNDER ASSUMED NAMES?

25 A YES.

26 Q DID HE EVER GHOSTWRITE FOR OTHER AUTHORS?

27 A I HAVE NO INFORMATION TO THAT EFFECT.

28 Q HAVE YOU MADE COPIES OF THE DISPATCH FOR YOUR OWN



1 USE?

2 A I DON'T BELIEVE SO.

3 Q WAS THAT DISPATCH PROVIDED TO OMAR GARRISON?

4 A YES.

5 Q AND SINCE YOU PROVIDED THIS TO OMAR GARRISON,  
6 YOU HAVE OBTAINED NO COPIES FROM HIM AND MADE COPIES OF HIS  
7 COPY; IS THAT CORRECT?

8 A YES.

9 Q WAS PART OF THE ARCHIVES COLLECTION COMPLETE  
10 SETS OF DOCUMENTS CONCERNING MR. HUBBARD'S NAVAL DATA OR THE  
11 VARIOUS MILITARY SCHOOLS OR ACTIVITIES HE WAS INVOLVED IN?

12 A YES.

13 Q HAVE YOU MADE COPIES OF ANY OF THOSE DOCUMENTS  
14 FOR ANYONE EXCEPT MR. GARRISON?

15 A YES.

16 Q AND WHO WOULD THOSE PERSONS BE?

17 A MY ATTORNEYS.

18 Q AND YOURSELF, ALSO?

19 A I DIDN'T RETAIN ANY COPIES.

20 Q IS IT A CORRECT STATEMENT THAT AT THE PRESENT  
21 TIME YOU HAVE NO COPIES OF ANY OF THE MATERIALS?

22 A YES.

23 Q ALL COPIES HAVE BEEN PROVIDED TO YOUR ATTORNEYS?

24 A YES.

25 Q HAVE EACH OF THE ATTORNEYS BEEN PROVIDED THE  
26 IDENTICAL MATERIALS?

27 A NO.

28 Q HAVE COPIES OF ALL OF THE MATERIALS BEEN PROVIDED

1 TO MR. FLYNN OR HIS OFFICE?

2 A NO.

3 Q HAVE COPIES OF THE NAVAL DOCUMENTS AND RECORDS  
4 BEEN PROVIDED TO MR. FLYNN?

5 A YES.

6 Q WHAT DOCUMENTS ARE INCLUDED IN THOSE COPIES?

7 A TO THE BEST OF MY RECOLLECTION, THERE ARE  
8 TRANSFER PAPERS, MEDICAL PAPERS. THAT'S WHAT I RECALL.

9 Q DISCHARGE PAPERS?

10 A I DON'T RECALL THAT DOCUMENT.

11 Q TRANSCRIPTS FROM A BOARD OF INQUIRY CONCERNING  
12 FIRING SHELLS OFF SHORE OF CORONADO ISLAND?

13 A YES.

14 Q NOW, WERE THESE DOCUMENTS WITHIN -- LET'S SIMPLY  
15 CALL THEM THE NAVAL COLLECTION.

16 WERE THOSE FROM MR. HUBBARD'S PERSONAL FILES OR  
17 WERE THOSE OBTAINED FROM OTHER SOURCES?

18 A HIS PERSONAL FILES.

19 Q AND WITHIN HIS PERSONAL FILES WAS THERE A COPY OF  
20 THE TRANSCRIPT OF PROCEEDINGS OF THE BOARD OF INQUIRY  
21 CONCERNING THE CORONADO INCIDENT, IF YOU CAN RECALL?

22 A MY UNDERSTANDING IS THAT IT WAS A COPY OBTAINED  
23 FOR HIM BY THE GUARDIAN'S OFFICE.

24 Q DO YOU KNOW WHEN THAT COPY WAS OBTAINED?

25 A NO.

26 Q ARE YOU FAMILIAR WITH AN INDIVIDUAL KNOWN AS  
27 MICHAEL SHANNON OR ALSO KNOWN AS MICHAEL HESS, H-E-S-S?

28 A YES.

1 Q AND WHO IS THAT PERSON?

2 A MICHAEL SHANNON IS AN INDIVIDUAL, WHO IN ABOUT  
3 1977 THROUGH '78, PERHAPS, DID RESEARCH INTO THE LIFE OF  
4 L. RON HUBBARD.

5 Q TO THE BEST OF YOUR KNOWLEDGE, DID MR. SHANNON  
6 DO ANYTHING ELSE BESIDES RESEARCH INTO MR. HUBBARD'S LIFE?

7 A THAT IS ALL I KNOW ABOUT THE MAN.

8 Q HAVE YOU EVER HAD ANY COMMUNICATION WHATSOEVER  
9 WITH MR. SHANNON?

10 A NO.

11 Q WHAT IS YOUR SOURCE OF INFORMATION CONCERNING  
12 MR. SHANNON?

13 A A MAN BY THE NAME OF PERRY CHAPDELAIN.

14 Q WHO IS HE?

15 A PERRY CHAPDELAIN IS -- I DON'T KNOW WHAT HE  
16 DOES, BUT HE'S FROM TENNESSEE. HE WAS AN EARLY DIANETICIST  
17 AND ACQUAINTANCE OR FRIEND OF L. RON HUBBARD.

18 Q IS HE ALSO A COLLECTOR OF MEMORABILIA CONCERNING  
19 MR. HUBBARD?

20 A NO.

21 Q IS HE A CURRENT MEMBER OF THE CHURCH OF  
22 SCIENTOLOGY, IF YOU KNOW?

23 A I DON'T KNOW.

24 Q WHAT DID MR. CHAPDELAIN TELL YOU ABOUT  
25 MR. SHANNON?

26 A HE SENT ME A THING WHICH SHANNON WROTE ABOUT  
27 MR. HUBBARD.

28 Q WHAT WAS THE NATURE OF THE THING? WAS IT A

1 MAGAZINE ARTICLE OR A MANUSCRIPT?

2 A I THINK IT WAS A MANUSCRIPT.

3 Q DID YOU EVER TRY TO CONTACT MR. SHANNON TO SEE IF  
4 HE HAD OBTAINED ANY MATERIALS THAT SHOULD BE ADDED TO THE  
5 ARCHIVES COLLECTION?

6 A NOT PERSONALLY.

7 Q WHEN YOU SAY "NOT PERSONALLY," WHAT DO YOU MEAN?

8 A I ASKED -- AND I DON'T RECALL WHO -- SOMEONE IN  
9 THE GUARDIAN'S OFFICE IF THEY HAD ANY WAY OF CONTACTING  
10 SHANNON.

11 Q AND WHAT WERE YOU TOLD?

12 A THAT THEY DID NOT.

13 Q WHEN YOU LEARNED OF MR. SHANNON'S MAGAZINE  
14 ARTICLE OR MANUSCRIPT, WERE YOU CONCERNED THAT HE WAS WRITING  
15 A BIOGRAPHY?

16 A YES.

17 Q WHAT WAS THE NATURE OF YOUR CONCERN?

18 A MY CONCERN AT THAT TIME WAS THAT THIS WAS GOING  
19 TO BE A HATCHET JOB.

20 Q NOW, IT IS A FACT, IS IT NOT, MR. ARMSTRONG, ON  
21 A NUMBER OF OCCASIONS YOU WENT OUT INTO THE FIELD -- AND BY  
22 "THE FIELD," I MEAN DIFFERENT AREAS OF THE COUNTRY -- TO  
23 COLLECT VARIOUS MATERIALS CONCERNING MR. HUBBARD; IS THAT  
24 TRUE?

25 A YES.

26 Q ON THOSE VARIOUS TRIPS OF YOURS DID YOU EVER RUN  
27 ACROSS EVIDENCE THAT MR. SHANNON HAD ALSO BEEN ENGAGED IN  
28 COLLECTING MATERIALS?

1 A YES.

2 Q AND WHERE DID YOU FIND EVIDENCE OF HIS COLLECTION  
3 ACTIVITIES?

4 A TILDEN, NEBRASKA.

5 Q WHAT FORM OF EVIDENCE DID YOU FIND THERE?

6 A CORRESPONDENCE WITH A LIBRARIAN.

7 Q WERE THERE ANY OTHER OCCASIONS WHEN YOU FOUND  
8 EVIDENCE OF MR. SHANNON'S COLLECTION ACTIVITIES?

9 A YES.

10 Q AND WHERE WAS THAT?

11 A WITH HELEN O'BRIEN.

12 Q AND WHAT WAS THE NATURE OF THAT DISCOVERY ON YOUR  
13 PART?

14 A THAT HE HAD SENT HER CORRESPONDENCE.

15 Q DO YOU KNOW WHAT WAS INCLUDED IN THE CORRESPONDENCE?

16 A HE, TO MY RECOLLECTION, REQUESTED A COPY OF HER  
17 BOOK DIANETICS IN LIMBO.

18 Q DO YOU KNOW IF ANYBODY WITHIN THE CHURCH OF  
19 SCIENTOLOGY, INCLUDING THE GUARDIAN'S OFFICE, EVER PROVIDED  
20 YOU WITH ANY MATERIALS THEY OBTAINED FROM MR. SHANNON?

21 A YES.

22 Q AND WHAT WERE THOSE MATERIALS?

23 A THOSE WERE THE SUPPORTING DOCUMENTS TO THE OTHER  
24 EARLIER DOCUMENT WHICH I HAD RECEIVED FROM PERRY CHAPDELAIN.

25 Q WHAT WAS THE SUBJECT MATTER OF THOSE DOCUMENTS?

26 A THEY CONCERNED THE HISTORY, LIFE, CREDENTIALS  
27 OF L. RON HUBBARD.

28 Q DID THEY ALSO CONCERN HIS NAVAL HISTORY?

1 A YES.

2 Q WERE THOSE MATERIALS THAT YOU RECEIVED FROM  
3 MR. SHANNON THEN INCLUDED IN THE ARCHIVES COLLECTION?

4 A THEY WERE INCLUDED IN COPIES OF THE ARCHIVES  
5 COLLECTION, WHICH I MADE AND WHICH I LEFT WITHIN THE  
6 ORGANIZATION.

7 Q DID YOU MAKE ANY COPY OF THOSE COPIES THAT ARE  
8 NOW IN THE POSSESSION OF YOUR ATTORNEYS OR ANYONE ELSE?

9 A THEY ARE IN THE POSSESSION OF OMAR GARRISON.

10 Q DID YOU INDICATE TO MR. GARRISON THE SOURCE OF  
11 THIS DATA?

12 A I DON'T RECALL.

13 Q WAS IT YOUR HABIT AND CUSTOM TO INDICATE TO  
14 MR. GARRISON THE SOURCE OF MATERIALS YOU WERE PROVIDING TO  
15 HIM?

16 A YES.

17 Q WOULD IT BE REASONABLE TO ASSUME ALSO ON THIS  
18 OCCASION YOU IDENTIFIED PARTICULARLY SOME OF THE NAVY  
19 DOCUMENTS THAT HAD BEEN OBTAINED THROUGH MR. SHANNON?

20 A YES.

21 Q ARE ANY OF THOSE MATERIALS OBTAINED FROM  
22 MR. SHANNON ALSO AMONG THE MATERIALS YOU HAVE PROVIDED TO  
23 YOUR ATTORNEYS?

24 A NO.

25 Q HAVE YOUR ATTORNEYS PROVIDED YOU WITH COPIES AT  
26 ANY TIME OF ANY OF THE SHANNON MATERIALS?

27 A NO.

28 Q IF YOU CAN REFRESH MY RECOLLECTION, YESTERDAY YOU

1 STATED THAT MR. FLYNN ON AT LEAST ONE OCCASION HAD PROVIDED  
2 YOU WITH SOME MATERIALS. I BELIEVE YOU STATED THOSE WERE THE  
3 S.P. DECLARES ON YOURSELF.

4 WERE THERE OTHER MATERIALS NOT OFFERED BY  
5 MR. FLYNN THAT WERE PROVIDED TO YOU?

6 A MR. FLYNN DID NOT PROVIDE ME WITH COPIES OF THE  
7 DECLARES ON MYSELF. MR. FLYNN PROVIDED ME WITH COPIES OF  
8 THE DECLARES ON BILL ROBERTSON AND WARREN FRISKE.

9 Q BESIDES THOSE DECLARES, WERE THERE ANY OTHER  
10 MATERIALS PROVIDED TO YOU BY MR. FLYNN OF WHICH HE OR MEMBERS  
11 OF HIS OFFICE WERE NOT THE AUTHORS?

12 A NO.

13 Q SO THAT IS THE ONLY MATERIAL, EXCEPT PRIVILEGED  
14 AND CONFIDENTIAL CORRESPONDENCE BETWEEN YOU AND MR. FLYNN,  
15 THAT HE HAS PROVIDED TO YOU; IS THAT CORRECT?

16 A YES.

17 Q WITHIN THE ARCHIVES COLLECTION WAS THERE ALSO  
18 FILE FOLDERS OR FILE PARTITIONS IDENTIFIED AS THE CARIBBEAN  
19 MOTION PICTURE EXPEDITION?

20 A YES.

21 Q AND WHAT CAN YOU RECALL CONCERNING THOSE  
22 MATERIALS?

23 A THEY WERE FOR THE MOST PART CORRESPONDENCE PRIOR  
24 TO THE EXPEDITION, CONTRACTS WITHIN THE EXPEDITION, LETTERS  
25 THAT MR. HUBBARD RETAINED, LETTERS AND OTHER CORRESPONDENCE  
26 BETWEEN HIM AND HIS MOTHER OR FATHER DURING THE EXPEDITION,  
27 NEWSPAPERS ARTICLES PRIOR AND FOLLOWING THE EXPEDITION,  
28 AND A NUMBER OF LEGAL CLAIMS AND COUNTERCLAIMS FOLLOWING THE

1 EXPEDITION.

2 Q BASED UPON YOUR INFORMATION AND RESEARCH, DID  
3 MR. HUBBARD IN FACT MAKE A CARIBBEAN MOTION PICTURE  
4 EXPEDITION?

5 A HE MADE A CARIBBEAN EXPEDITION. I DON'T KNOW THAT  
6 MOTION PICTURES WERE ACTUALLY TAKEN.

7 Q DO YOU MAKE ANY CLAIM THAT MR. HUBBARD HAS  
8 MISREPRESENTED ANY MATERIAL FACT CONCERNING A CARIBBEAN  
9 MOTION PICTURE EXPEDITION?

10 A THAT UNDERWATER PICTURES WERE PROVIDED THE  
11 UNIVERSITY OF MICHIGAN.

12 Q IS IT YOUR CLAIM THAT NO SUCH PICTURES WERE  
13 PROVIDED?

14 A YES.

15 Q IS THAT BASED UPON THE FACT THAT YOU SAW  
16 CORRESPONDENCE OR EVIDENCE STATING THAT NO PICTURES WERE  
17 PROVIDED OR THAT YOU COULD FIND NO EVIDENCE THAT THE PICTURES  
18 WERE PROVIDED?

19 A TO MY RECALL RIGHT NOW, I BELIEVE BOTH.

20 Q HAVE ANY OF THESE MATERIALS BEEN PROVIDED TO YOUR  
21 ATTORNEYS OR OTHERS BY YOU?

22 A I DON'T BELIEVE SO.

23 Q WITHIN THE ARCHIVES COLLECTION WAS THERE ANY  
24 MATERIAL PERTAINING TO THE CRIMINAL COMPLAINTS FILED IN  
25 WASHINGTON, D.C., AND THE UNITED KINGDOM AGAINST ELEVEN  
26 MEMBERS OF THE CHURCH OF SCIENTOLOGY?

27 A YES.

28 IN THE ARCHIVES COLLECTION?



1 Q YES.

2 A NO.

3 Q CAN YOU RECALL EVER SETTING UP A VOLUME OR SERIAL  
4 CONCERNING THE UNITED KINGDOM'S TRIALS, THE SENTENCING,  
5 BRIEFING, AND TRANSCRIPTION OF PROCEEDINGS?

6 A YES.

7 Q WHERE DID YOU SET THAT FILE UP?

8 A WITHIN THE OFFICE DOWN IN THE CEDARS COMPLEX.

9 Q WAS THAT WITHIN YOUR HAT AS THE ARCHIVIST?

10 A IT WAS WITHIN MY HAT AS OMAR GARRISON'S LIAISON.

11 Q HOW DOES THAT BECOME PART OF MR. HUBBARD'S  
12 BIOGRAPHY, IN YOUR MIND?

13 A IT IS NOT A PART OF MR. HUBBARD'S BIOGRAPHY THAT  
14 I KNOW OF. IT MAY BE, BUT....

15 Q DID MR. GARRISON REQUEST THOSE MATERIALS OR DID  
16 YOU PRODUCE THEM TO HIM WITHOUT A REQUEST?

17 A HE REQUESTED THEM.

18 Q HAVE COPIES OF ANY OF THOSE MATERIALS BEEN  
19 PROVIDED TO YOUR ATTORNEYS?

20 A NO.

21 MS. DRAGOJEVIC: DO YOU WANT TO TAKE A SHORT BREAK  
22 HERE?

23 MR. KOHLWECK: THAT WOULD BE FINE.

24 (BRIEF RECESS.)

25 Q BY MR. KOHLWECK: MR. ARMSTRONG, I KNOW I ALREADY  
26 ASKED YOU ABOUT A JOHN PARSONS, BUT LET'S SEE IF I CAN  
27 REFRESH YOUR RECOLLECTION HERE.

28 DO YOU RECALL ANY FILE MATERIALS BEING PUT

1 TOGETHER REGARDING A JOHN W. PARSONS AND AN O.T.O.?

2 A YES.

3 Q DO YOU RECALL WHAT THOSE FILES WERE ABOUT?

4 A THOSE FILES CONTAINED -- THEY CONTAINED  
5 INCORPORATION PAPERS, I BELIEVE, OR SIMILAR PAPERS TO DO WITH  
6 AN ALLIED ENTERPRISES, WHICH WAS A CORPORATION WHICH  
7 MR. HUBBARD HAD WITH JOHN W. PARSONS; THEY CONTAINED SOME  
8 CORRESPONDENCE IN CONNECTION WITH THAT COMPANY; THEY  
9 CONTAINED ALLEGATIONS WHICH WERE MADE IN VARIOUS PUBLICATIONS  
10 WHICH CONNECTED MR. HUBBARD INTO THE O.T.O., ORDO TEMPLI  
11 ORIENTAS. AND THAT IS PRINCIPALLY IT.

12 Q DO YOU SPEAK ANY LATIN WHATSOEVER, MR. ARMSTRONG?

13 A NO.

14 Q DO YOU KNOW WHAT THE TRANSLATION OF O.T.O. IS INTO  
15 ENGLISH, WHAT IT MEANS?

16 A I WAS TOLD IT WAS ORDER OF THE EASTERN TEMPLARS.

17 Q AND THAT WAS A SECRET SOCIETY, WAS IT NOT?

18 A YES.

19 Q AND THAT SOCIETY ENGAGED IN BLACK MAGIC AND  
20 POSSIBLY WITCHCRAFT, IF YOU KNOW?

21 A THOSE WERE THE CLAIMS MADE.

22 Q WHO MADE THOSE CLAIMS, IF YOU CAN RECALL?

23 A THOSE VARIOUS PUBLICATIONS WHICH I MENTIONED.

24 Q TO THE BEST OF YOUR KNOWLEDGE AND RECOLLECTION,  
25 HAS MR. HUBBARD EVER MADE ANY REPRESENTATIONS CONCERNING  
26 JOHN W. PARSONS AND O.T.O.?

27 A MR. HUBBARD CLAIMED THAT HE HAD BEEN SENT IN AS  
28 AN AGENT OF NAVAL -- U.S. NAVAL INTELLIGENCE TO BREAK UP THAT

1 BLACK MAGIC RING AND THAT HE RESCUED A GIRL FROM IT.

2 Q DO YOU KNOW WHO THAT GIRL WAS?

3 A I DON'T KNOW.

4 Q DO YOU BELIEVE MR. HUBBARD'S REPRESENTATIONS TO  
5 BE UNTRUE?

6 A YES.

7 Q AND UPON WHAT DO YOU BASE THAT BELIEF?

8 A THE INFORMATION CONTAINED IN THE FILES WHICH I  
9 COLLECTED ON THE BASIS OF AN INTERVIEW WHICH WAS DONE WITH  
10 THE CURRENT HEAD OF THE O.T.O.

11 Q AND WHO IS THAT PERSON?

12 A GRADY MC MURTRY.

13 Q AND DID HE KNOW MR. HUBBARD OR MR. PARSONS  
14 PERSONALLY?

15 A YES.

16 Q AND AT WHAT TIME PERIOD DID HE KNOW ONE OR BOTH  
17 OF THESE INDIVIDUALS?

18 A DURING THAT TIME PERIOD.

19 Q DID HE KNOW BOTH MR. PARSONS AND MR. HUBBARD?

20 A YES.

21 Q DO YOU RECALL IF THE CONTENTS OF THESE FILES  
22 WERE BASICALLY F.B.I. REPORTS THAT HAD BEEN OBTAINED UNDER  
23 THE FREEDOM OF INFORMATION ACT?

24 A NO, THEY WERE NOT.

25 Q HAVE ANY OF THESE MATERIALS BEEN PROVIDED TO ANY  
26 PERSON OTHER THAN OMAR GARRISON BY YOURSELF?

27 A WHICH MATERIALS ARE YOU REFERRING TO?

28 Q THE MATERIALS CONTAINED IN THE JOHN W. PARSONS

1 AND O.T.O. FILES?

2 A YES.

3 Q AND TO WHOM HAVE THOSE MATERIALS BEEN PROVIDED?

4 A MY ATTORNEYS.

5 Q ON WHAT DATES WERE THEY PROVIDED?

6 A APPROXIMATELY JUNE OF THIS YEAR.

7 Q WHAT MATERIALS FROM THESE FILES HAVE BEEN  
8 PROVIDED?

9 A TO THE BEST OF MY RECOLLECTION, A COMPLETE COPY  
10 OF THE ALLIED ENTERPRISES FILE.

11 Q WHEN DID YOU COME INTO POSSESSION OF THE COPY OF  
12 THESE MATERIALS?

13 A APPROXIMATELY JUNE.

14 Q WHO DID YOU OBTAIN THOSE MATERIALS FROM?

15 A OMAR GARRISON.

16 Q DID MR. GARRISON AT THAT TIME KNOW YOU WERE NO  
17 LONGER PART OF THE ARCHIVES PROJECT?

18 A YES.

19 Q DID YOU HAVE ANY DISCUSSION CONCERNING THESE  
20 MATERIALS?

21 A JUST THAT I WOULD COPY THEM FOR HIM.

22 Q DID YOU REQUEST SOME MATERIALS OF MR. GARRISON?

23 A I'M SORRY. WHAT WAS THE QUESTION?

24 Q DID YOU REQUEST THE MATERIALS OF MR. GARRISON?

25 A I DON'T RECALL. HE MAY HAVE ASKED ME TO COPY  
26 THEM FOR HIM.

27 Q DURING THIS PERIOD OF TIME WHERE WAS  
28 MR. GARRISON PHYSICALLY LOCATED?

1 A EITHER IN COSTA MESA, CALIFORNIA, OR IN UTAH.

2 Q HAVE YOU EVER BEEN TO MR. GARRISON'S RESIDENCE  
3 IN UTAH?

4 A YES.

5 Q HOW LARGE A TOWN IS CEDAR BLUFFS, IF THAT IS  
6 WHERE HE LIVES?

7 A HE LIVES IN CEDAR CITY.

8 Q OR CEDAR CITY.

9 A CEDAR CITY IS A TOWN OF, I WOULD SAY, 15,000  
10 PEOPLE.

11 Q DO YOU KNOW IF MR. GARRISON OWNS A COPYING  
12 MACHINE OF ANY SORT?

13 A NO, I DON'T.

14 Q DO YOU KNOW IF THE TOWN OF CEDAR CITY HAS  
15 COPYING FACILITIES AT ANY PLACE?

16 A NO, I DON'T.

17 Q DO YOU KNOW IF COPYING FACILITIES ARE LOCATED IN  
18 OR AROUND COSTA MESA, CALIFORNIA?

19 A YES.

20 Q HAS MR. GARRISON EVER EXPLAINED TO YOU WHY IT IS  
21 NECESSARY TO HAVE YOU COPY MATERIALS FOR HIM RATHER THAN  
22 HE HAVING THE MATERIALS COPIED HIMSELF?

23 A NO.

24 Q WHEN MR. GARRISON IS IN CEDAR CITY AND EITHER  
25 YOU OR HE REQUESTS THAT COPIES BE MADE, HOW ARE DOCUMENTS  
26 PROVIDED TO YOU?

27 A EITHER I HAVE BEEN AT HIS HOUSE OR HE HAS COME  
28 DOWN HERE.

1 Q HAS HE EVER MAILED DOCUMENTS TO YOU?

2 A TO MY RECOLLECTION, NO.

3 Q SO EVERY TIME YOU HAVE WANTED TO COPY ANY  
4 DOCUMENTS FROM HIM OR HE HAS REQUESTED THAT YOU COPY DOCUMENTS,  
5 THERE HAS BEEN A FACE-TO-FACE EXCHANGE OF THOSE DOCUMENTS?

6 A YES.

7 Q NOW, YOU MENTIONED YESTERDAY AND ALSO TODAY THAT  
8 CURRENTLY YOU HAVE NO DOCUMENTS IN YOUR POSSESSION, THAT  
9 THEY ALL HAVE BEEN RETURNED TO YOUR ATTORNEYS OR TO  
10 MR. GARRISON; IS THAT A CORRECT STATEMENT?

11 A YES.

12 Q WHEN IS THE LAST TIME YOU PROVIDED MATERIALS TO  
13 EITHER MR. GARRISON OR YOUR ATTORNEYS?

14 A TWO DAYS AGO.

15 Q AND THAT WOULD BE MONDAY?

16 A YES.

17 Q TO WHOM DID YOU PROVIDE MATERIALS?

18 A TO MICHAEL FLYNN AND TO OMAR GARRISON.

19 Q APPROXIMATELY HOW MANY DOCUMENTS DID YOU PROVIDE  
20 TO EACH OF THOSE TWO INDIVIDUALS?

21 LET'S START WITH MR. GARRISON.

22 A OH, ABOUT 450 PAGES TO MR. GARRISON.

23 Q AND TO MR. FLYNN?

24 A 1,000 PAGES.

25 Q WHAT WAS INCLUDED IN THE 450 PAGES SENT TO  
26 MR. GARRISON?

27 A THREE VOLUMES FROM EXCALIBUR.

28 Q COMPLETE VOLUMES OR CHAPTERS?

1 A IT WAS ONE COMPLETE VOLUME.

2 Q WERE THERE ANY OTHER MATERIALS PROVIDED TO  
3 MR. GARRISON?

4 A NO.

5 Q IS EXCALIBUR, TO THE BEST OF YOUR INFORMATION OR  
6 BELIEF, TO BE PART OF THE BIOGRAPHY?

7 A WHAT DO YOU MEAN BY THAT QUESTION?

8 Q DO YOU KNOW IF MR. GARRISON, IN HIS TREATMENT OF  
9 MR. HUBBARD'S BIOGRAPHY, INTENDS TO WRITE ANY PORTION OF THE  
10 BOOK EXCALIBUR?

11 A I BELIEVE SO.

12 Q AND WHAT WAS THE PURPOSE OF YOUR HAVING COPIES  
13 OF EXCALIBUR IN YOUR POSSESSION UP UNTIL MONDAY OF THIS  
14 WEEK?

15 A I HAVE GONE THROUGH VARIOUS FILES, BINDERS, IN  
16 ORDER TO ASSIST HIM WITH HIS RESEARCH. AND I WOULD  
17 OCCASIONALLY POINT OUT VARIOUS THINGS WHICH PERHAPS WERE OF  
18 BIOGRAPHICAL USE.

19 Q AM I MISTAKEN IN MY BELIEF THAT EXCALIBUR IS A  
20 WORK OF COMPLETE FICTION?

21 A I BELIEVE IT WOULD NOT BE CLASSIFIED AS A WORK  
22 OF FICTION.

23 Q WHAT DOES EXCALIBUR CONCERN, THEN?

24 A EXCALIBUR CONCERNS THE STATEMENT OF THE PREMISE  
25 THAT THE BASIC AND MOST COMMON DENOMINATOR OF EXISTENCE IS  
26 SURVIVAL, AND THEN A SUBSEQUENT EXPANSION OF THAT PREMISE IS  
27 TO COVER VARIOUS ASPECTS OF HUMAN, ANIMAL, PLANT, CELLULAR,  
28 ET CETERA, LIFE.

1 Q IN THE TIME THAT YOU WERE IN POSSESSION OF A  
2 COPY OF EXCALIBUR, DID YOU MAKE ANY OTHER COPIES OF THAT  
3 MANUSCRIPT?

4 A NO.

5 Q SO THE COPY RETURNED TO OMAR GARRISON, TO THE BEST  
6 OF YOUR INFORMATION AND BELIEF, IS THE ONLY COPY THAT  
7 EXISTS OUTSIDE OF THE ARCHIVES RIGHT NOW; IS THAT TRUE?

8 A THAT'S TRUE.

9 Q ALL RIGHT. WERE THERE ANY OTHER MATERIALS  
10 PROVIDED TO MR. GARRISON IN THIS LATEST DISPATCH OF 450 PAGES?

11 A NO.

12 Q IN THE 1,000 PAGES PROVIDED TO MR. FLYNN, WHAT  
13 WERE THE MATERIALS INCLUDED?

14 A THEY INCLUDED INFORMATION ON HUBBARD EXPLORATIONAL  
15 COMPANY, ON MR. HUBBARD'S LETTERS TO MARY SUE HUBBARD FROM  
16 1967.

17 THAT IS BASICALLY IT.

18 Q APPROXIMATELY HOW MANY PAGES WOULD YOU ESTIMATE --  
19 NOT GUESS, ESTIMATE -- ARE DEVOTED TO COPIES OF CORRESPONDENCE  
20 BETWEEN L. RON HUBBARD AND MARY SUE HUBBARD?

21 A I WOULD SAY 400.

22 Q AND THE REMAINING APPROXIMATELY 600 PAGES WOULD  
23 CONCERN THE EXPLORATION COMPANY?

24 A YES.

25 Q WERE ANY ORIGINAL MATERIALS RATHER THAN COPIES  
26 INCLUDED IN THESE MATERIALS THAT YOU PROVIDED TO MR. FLYNN  
27 ON MONDAY OF THIS WEEK?

28 A YES.



1 Q AND WHAT MATERIALS ARE THOSE?

2 A THOSE WERE THE EXPLORATIONAL COMPANY MATERIALS.

3 Q AND WHAT IS INCLUDED IN THE EXPLORATIONAL COMPANY  
4 MATERIALS?

5 A INFORMATION ON BOATS, INFORMATION ON THE  
6 ESTABLISHMENT OF THE SEA ORGANIZATION, INFORMATION ON  
7 FINANCES CONNECTED WITH THOSE ORGANIZATIONS, AND THAT SORT  
8 OF THING.

9 Q ANY DOCUMENTS OR PAGES CONCERNING THE SEA  
10 ORGANIZATION RESERVES OR RESERVE FUND?

11 A NOTHING THAT I SAW.

12 Q ANYTHING CONCERNING S.O.R. INTERNATIONAL?

13 A NOT THAT I SAW.

14 Q DO YOU KNOW WHAT THE TERM "S.O.R. INTERNATIONAL"  
15 MEANS?

16 A I WOULD ASSUME IT MEANS SEA ORG RESERVE  
17 INTERNATIONAL.

18 Q AND WHAT WAS YOUR SOURCE OF THOSE ORIGINAL  
19 DOCUMENTS THAT YOU PROVIDED TO MR. FLYNN?

20 A MR. GARRISON.

21 Q DID YOU RETURN COPIES OF THESE ORIGINAL DOCUMENTS  
22 TO MR. GARRISON?

23 A NO.

24 Q SO MR. GARRISON'S FILES ARE NOW WITHOUT COPY OR  
25 ORIGINAL MATERIAL; IS THAT CORRECT?

26 A THAT'S CORRECT.

27 Q IS THE ARCHIVE ALSO WITHOUT COPY OR ORIGINAL  
28 MATERIALS?

1           A        THAT'S CORRECT.

2           Q        IS IT YOUR INTENT TO RETURN THESE ORIGINAL  
3 MATERIALS TO THE CHURCH OF SCIENTOLOGY?

4           MS. DRAGOJEVIC: OBJECTION.

5           MR. KOHLWECK: IF YOU WANT TO CLAIM FIFTH AMENDMENT  
6 PRIVILEGE, I WILL DROP IT. IF YOU DON'T, I WILL PURSUE IT.

7                    (DISCUSSION BETWEEN THE WITNESS  
8                    AND HIS COUNSEL OUT OF THE HEARING  
9                    OF THE REPORTER.)

10          MS. DRAGOJEVIC: ON THE GROUNDS OF ATTORNEY-CLIENT  
11 PRIVILEGE. HOWEVER, I WILL LET THE WITNESS ANSWER THE  
12 QUESTION IN PART.

13          THE WITNESS: AND THAT IS THAT I AM SEEKING ADVICE OF  
14 MY ATTORNEY.

15          Q        BY MR. KOHLWECK: DO YOU MAKE ANY CLAIM OF  
16 OWNERSHIP UPON THESE PAPERS THAT HAVE BEEN PROVIDED TO  
17 MR. FLYNN, THE ORIGINAL MATERIALS? AND YOU AND I DISCUSSED  
18 "OWNERSHIP" YESTERDAY. I AM USING THE SAME DEFINITION THAT  
19 YOU PROVIDED AT THAT TIME.

20          A        ON THOSE MATERIALS, NONE.

21          Q        ARE YOU AWARE OF ANY CLAIM OF OWNERSHIP OF THOSE  
22 MATERIALS BY THE CHURCH OF SCIENTOLOGY OF CALIFORNIA?

23          A        I DON'T KNOW HOW TO ANSWER THAT QUESTION.

24          Q        WERE YOU AT ANY TIME AND IN ANY MANNER LED TO  
25 BELIEVE THAT THOSE DOCUMENTS WERE THE PROPERTY OF THE  
26 CHURCH OF SCIENTOLOGY OF CALIFORNIA; AND IF SO, BY WHO OR  
27 IN WHAT MANNER WERE YOU SO LED TO BELIEVE?

28          A        NO, NOT UNTIL THIS SUIT WAS BROUGHT.

1 Q IT WAS YOUR BELIEF, THEREFORE, THAT ANY MATERIALS  
2 THAT YOU COULD PUT YOUR HANDS ON WERE NOT NECESSARILY OWNED  
3 BY THE CHURCH OF SCIENTOLOGY OF CALIFORNIA; IS THAT A TRUE  
4 STATEMENT?

5 A NO.

6 Q WHAT IS TRUE, THEN?

7 A A TRUE STATEMENT IS THAT THOSE ORIGINAL MATERIALS  
8 IN QUESTION WERE OWNED BY, AT THE TIME I DELIVERED THEM TO  
9 MR. GARRISON, L. RON HUBBARD.

10 Q DO YOU HAVE ANY PRESENT INTENT TODAY TO RETURN  
11 THOSE DOCUMENTS TO MR. L. RON HUBBARD?

12 AND THAT IS NOT CALLING FOR A LEGAL CONCLUSION.  
13 I AM ASKING FOR YOUR PERSONAL BELIEF AS OF THIS MOMENT IN  
14 TIME.

15 MS. DRAGOJEVIC: I AM GOING TO OBJECT TO THAT. THAT  
16 QUESTION HAS BEEN ASKED AND ANSWERED. I INSTRUCT THE  
17 WITNESS NOT TO ANSWER.

18 MR. KOHLWECK: NO. THE FIRST TIME IT WAS ASKED IT WAS  
19 CONCERNING THE CHURCH OF SCIENTOLOGY. NOW WE ARE TALKING  
20 ABOUT L. RON HUBBARD, WHO THE WITNESS HAS IDENTIFIED AS THE  
21 PROBABLE TRUE OWNER OF THESE DOCUMENTS.

22 MS. DRAGOJEVIC: THEN, I AM GOING TO REPEAT THE SAME  
23 OBJECTION BASED ON ATTORNEY-CLIENT PRIVILEGE AND ALLOW THE  
24 WITNESS TO ANSWER IN PART AS HE DID BEFORE.

25 Q BY MR. KOHLWECK: LET ME CLARIFY THE QUESTION.  
26 I AM NOT ASKING FOR ANY ADVICE YOU RECEIVED FROM COUNSEL.  
27 I AM ASKING FOR YOUR OWN STATE OF MIND AT THIS TIME.

28 A AND THAT IS I AM SEEKING LEGAL ADVICE AS TO THE

1 PROPER DESTINATION OF THOSE MATERIALS.

2 Q IF I WERE -- I WILL ASK YOU RIGHT NOW. I WILL  
3 MAKE A DEMAND ON BEHALF OF THE CHURCH OF SCIENTOLOGY FOR  
4 RETURN OF THOSE DOCUMENTS.

5 WILL YOU RETURN THOSE DOCUMENTS FROM MR. FLYNN  
6 AND DEPOSIT THOSE IN MY OFFICE WITHIN 24 HOURS?

7 MS. DRAGOJEVIC: I AM GOING TO OBJECT TO THAT QUESTION.

8 MR. KOHLWECK: THERE ARE NO GROUNDS FOR AN OBJECTION  
9 ON THAT QUESTION, BUT GO AHEAD FOR THE RECORD.

10 MS. DRAGOJEVIC: I THINK THAT MR. ARMSTRONG HAS IN  
11 ESSENCE ANSWERED THE QUESTION SEVERAL TIMES TODAY AND  
12 YESTERDAY. I BELIEVE THAT HE HAS INDICATED HE IS SEEKING THE  
13 ADVICE OF HIS ATTORNEY, AND THAT IS HIS PRESENT INTENT HERE  
14 TODAY. SO THAT WOULD BE HIS ANSWER TODAY. AND I AM  
15 INSTRUCTING HIM NOT TO ANSWER.

16 Q BY MR. KOHLWECK: MR. ARMSTRONG, HAVE YOU RETAINED  
17 ANY ATTORNEYS AT THIS TIME CONCERNING ANY POSSIBLE CRIMINAL  
18 MATTERS THAT YOU ARE INVOLVED IN?

19 MS. DRAGOJEVIC: OBJECTION; IRRELEVANT, NOT CALCULATED  
20 TO LEAD TO THE DISCOVERY OF ADMISSIBLE EVIDENCE. HOWEVER,  
21 THE WITNESS MAY ANSWER.

22 THE WITNESS: I AM AFRAID I DON'T KNOW WHAT THE ANSWER  
23 TO THAT QUESTION IS. I DON'T KNOW WHAT IS INVOLVED IN THIS  
24 AS FAR AS LEGAL ACTIONS ARE CONCERNED. SO I DON'T KNOW WHAT  
25 MY RETENTION OF COUNSEL -- I HAVE NOT TALKED THAT OVER WITH  
26 MY COUNSEL; SO I WOULD NEED TO DO THAT BEFORE I COULD  
27 ADEQUATELY ANSWER.

28 Q BY MR. KOHLWECK: DID YOU SEND THESE PAPERS TO

1 MR. FLYNN ON MONDAY AT HIS REQUEST?

2 A NO.

3 Q DID MR. FLYNN HAVE ANY FOREWARNING THAT HE WAS  
4 ABOUT TO RECEIVE THESE DOCUMENTS?

5 MS. DRAGOJEVIC: I AM GOING TO OBJECT TO THAT QUESTION  
6 BASED ON ATTORNEY-CLIENT PRIVILEGE GROUNDS, IN THAT IT  
7 CONCEIVABLY COULD QUESTION INTO ANY CONVERSATIONS THAT MAY  
8 HAVE OCCURRED BETWEEN MR. ARMSTRONG AND MR. FLYNN, AND THAT  
9 WOULD BE PRIVILEGED.

10 MR. KOHLWECK: I WILL RESPECT YOUR OBJECTION ON THAT,  
11 COUNSEL.

12 MS. DRAGOJEVIC: WHAT WAS THE QUESTION, AGAIN?

13 MR. KOHLWECK: IF YOU WOULD REREAD THE QUESTION,  
14 PLEASE.

15 (RECORD READ BY REPORTER.)

16 MS. DRAGOJEVIC: I WOULD LIKE TO CONFER WITH THE  
17 WITNESS.

18 (DISCUSSION BETWEEN THE WITNESS  
19 AND HIS COUNSEL OUT OF THE HEARING  
20 OF THE REPORTER.)

21 MS. DRAGOJEVIC: I AM INSTRUCTING THE WITNESS NOT TO  
22 ANSWER THE QUESTION.

23 Q BY MR. KOHLWECK: MR. ARMSTRONG, I DO NOT WANT TO  
24 TAKE UNFAIR ADVANTAGE OF YOU. FOR THAT REASON I AM GOING TO  
25 SUGGEST AT THIS POINT WE BREAK FOR LUNCH AND FURTHER  
26 SUGGEST THAT YOU DISCUSS WITH YOUR COUNSEL LARCENY BY TRICK  
27 OR DEVICE, OBTAINING PROPERTY UNDER FALSE PRETENSE, AND  
28 COMMON LAW THEFT. I AM NOT GOING TO INQUIRE INTO YOUR

1 CONVERSATIONS, BUT I WANT YOU TO BE AWARE THAT I FEEL, AS A  
2 LICENSED ATTORNEY IN THE STATE OF CALIFORNIA, WE ARE NOW  
3 ENTERING CERTAIN CRIMINAL AREAS. I WANT YOU TO CONSIDER  
4 ASSERTING YOUR RIGHT TO FIFTH AMENDMENT AREAS AS TO THE  
5 QUESTIONS I AM GOING TO ASK AFTER LUNCH.

6 THE WITNESS: (TO HIS COUNSEL) DO YOU UNDERSTAND WHAT  
7 HE SAID?

8 MS. DRAGOJEVIC: YES, I UNDERSTAND WHAT HE SAID.

9 Q BY MR. KOHLWECK: I DON'T WANT TO TAKE UNFAIR  
10 ADVANTAGE OF YOU. I THINK YOU SHOULD CONSULT YOUR COUNSEL.

11 I THINK AT THIS TIME WE SHOULD BREAK FOR LUNCH.

12 (WHEREUPON, AT 12:25 P.M. A RECESS

13 WAS TAKEN UNTIL 1:50 P.M.)

14 MS. DRAGOJEVIC: I WOULD LIKE TO MAKE A STATEMENT FOR  
15 THE RECORD.

16 BEFORE WE BROKE FOR LUNCH, COUNSEL INDICATED THAT  
17 HE WAS GOING TO GO INTO AREAS INVOLVING POSSIBLE CRIMINAL  
18 ACTION TAKEN AGAINST MR. ARMSTRONG. SINCE THAT WOULD  
19 NECESSITATE MY CLIENT ASSERTING FIFTH AMENDMENT PRIVILEGES  
20 AGAINST SELF-INCRIMINATION, I INTEND TO ASSERT THE PRIVILEGE  
21 ON HIS BEHALF TO EVERY QUESTION WHICH MAY IN ANY WAY INVOLVE  
22 CRIMINAL ACTION BEING TAKEN. I WOULD REQUEST THAT WE  
23 STIPULATE THAT WHENEVER I MAKE AN OBJECTION, THAT THE OBJECTION  
24 IS BASED UPON THE PRIVILEGE AGAINST SELF-INCRIMINATION UNDER  
25 THE FIFTH AMENDMENT AND IT WILL ALSO INCLUDE AN INSTRUCTION  
26 NOT TO ANSWER, UNLESS I INDICATE OTHERWISE.

27 MR. KOHLWECK: SO STIPULATED, COUNSEL. BUT WHAT I WOULD  
28 SUGGEST IS FOR THE FIRST TIME AND FIRST TIME ONLY, WHY DON'T

1 YOU MAKE YOUR OBJECTION AND GROUNDS, AND WE WILL TREAT THAT  
2 AS A CONTINUING OBJECTION, AND THEN YOU CAN SIMPLY SAY  
3 "SAME OBJECTION, SAME INSTRUCTION" FOR CLARITY OF THE RECORD,  
4 IF THAT IS AGREEABLE WITH YOU.

5 MS. DRAGOJEVIC: FINE. I THINK I HAVE STATED THAT.  
6 WHEN I MAKE AN OBJECTION, MY OBJECTION IS BASED ON THE  
7 FIFTH AMENDMENT PRIVILEGE AGAINST SELF-INCRIMINATION, AND IT  
8 WILL ALSO INCLUDE AN INSTRUCTION NOT TO ANSWER, UNLESS I  
9 INDICATE OTHERWISE.

10 MR. KOHLWECK: FAIR ENOUGH.

11 Q MR. ARMSTRONG, BEFORE LUNCH WE WERE TALKING ABOUT  
12 SOME RECORDS, I BELIEVE, CALLED THE HUBBARD EXPLORATORY  
13 COMPANY.

14 AM I USING THE CORRECT DESIGNATION FOR THOSE  
15 RECORDS, OR IS THERE A DIFFERENT OFFICIAL TITLE FOR THOSE  
16 RECORDS?

17 A "EXPLORATIONAL COMPANY."

18 Q "EXPLORATIONAL COMPANY." OKAY.

19 WE WERE TALKING PRIOR TO LUNCH ALSO ABOUT THE  
20 TRANSMISSION OF CERTAIN DOCUMENTS TO MESSRS. FLYNN AND  
21 GARRISON.

22 HAVE THERE BEEN ANY OTHER TRANSMISSION OF  
23 DOCUMENTS TO THESE TWO INDIVIDUALS PRIOR TO MONDAY OF THIS  
24 WEEK?

25 MS. DRAGOJEVIC: OBJECTION.

26 MR. KOHLWECK: ON THE GROUNDS --

27 MS. DRAGOJEVIC: YES.

28 MR. KOHLWECK: COUNSEL, JUST AS A SUGGESTION -- I AM NOT

1 TRYING TO BE ARGUMENTATIVE -- IF YOU ARE MAKING OBJECTIONS ON  
2 THE GROUNDS OF IRRELEVANCY OR WHATEVER, ARE YOU SIMPLY GOING  
3 TO STATE THOSE?

4 MS. DRAGOJEVIC: YES.

5 MR. KOHLWECK: THANK YOU.

6 Q HAS MR. GARRISON AT ANY TIME INDICATED TO YOU HOW  
7 MANY COPIES OF DOCUMENTS THAT HE WISHED TO HAVE MADE WHEN HE  
8 REQUESTED THE COPIES BE MADE?

9 A AT TIMES HE INDICATED ONE.

10 Q HAS HE EVER INDICATED AT OTHER TIMES THAT MORE  
11 THAN ONE COPY SHOULD BE MADE?

12 MS. DRAGOJEVIC: OBJECTION.

13 Q BY MR. KOHLWECK: ARE YOU FAMILIAR WITH A  
14 SCIENTOLOGY EXPRESSION OF, QUOTE, "OODS"?

15 A YES.

16 Q WHAT DOES THAT TERM REFER TO?

17 A ORDERS OF THE DAY.

18 Q AND WHAT ARE ORDERS OF THE DAY?

19 A ORDERS OF THE DAY ARE ORDERS THAT ARE ISSUED,  
20 MIMEOGRAPHED OFF AT THE BEGINNING OF THE DAY OR AT SOME OTHER  
21 POINT IN THE DAY OR EVEN LATER, WHICH ARE FOR THAT DAY OR  
22 FOR ANY OTHER TIME, DEPENDING ON THE SIGNIFICANCE OF THE  
23 ORDER, AND WHICH ARE DISTRIBUTED TO STAFF.

24 Q MODERNLY, ARE THESE DISTRIBUTED TO ALL STAFF?  
25 AND WHEN I SAY "MODERNLY," I MEAN WITHIN THE LAST YEAR OR  
26 TWO, IF YOU KNOW.

27 A I DON'T KNOW.

28 Q DO YOU KNOW THE ORIGIN WITHIN SCIENTOLOGY OF



1 ORDERS OF THE DAY?

2 A NO.

3 Q WHILE YOU WERE ABOARD SHIP AND A SEABOARD  
4 MEMBER, WERE ORDERS OF THE DAY ROUTINELY ISSUED AS PART OF  
5 THE DAILY ROUTINE OF THE SHIP APOLLO?

6 A YES.

7 Q WOULD SUCH ORDERS HAVE VALUE TO COLLECTORS, BASED  
8 UPON YOUR INFORMATION AND EXPERIENCE?

9 A YES.

10 Q HAS MR. WILHITE, TO THE BEST OF YOUR INFORMATION  
11 AND BELIEF, EVER MADE AN ESTIMATE OF THE VALUE OF VARIOUS  
12 OODS?

13 A NO.

14 Q HAS HE EVER MADE AN ESTIMATE OF THE VALUE OF A  
15 COMPLETE SET OF OODS DURING THE TIME THE SHIP APOLLO WAS AT  
16 SEA?

17 A NO.

18 Q HAVE YOU EVER MADE A STATEMENT TO ANYONE THAT  
19 YOU HAD COLLECTED A COMPLETE SET OF ORDERS OF THE DAY OR  
20 COPIES OF ORDERS OF THE DAY FOR YOUR PERSONAL COLLECTION?

21 MS. DRAGOJEVIC: I WOULD LIKE TO CONFER WITH MY  
22 CLIENT.

23 (DISCUSSION BETWEEN THE WITNESS  
24 AND HIS COUNSEL OUT OF THE HEARING  
25 OF THE REPORTER.)

26 THE WITNESS: NO.

27 Q BY MR. KOHLWECK: YOU NEVER MADE SUCH A STATEMENT,  
28 TO THE BEST OF YOUR INFORMATION, BELIEF, AND RECOLLECTION?

1 A THAT'S CORRECT.

2 Q HAVE YOU IN FACT COLLECTED COPIES OF ORDERS OF  
3 THE DAY --

4 A NO.

5 Q -- FOR YOUR PERSONAL COLLECTION?

6 MS. DRAGOJEVIC: GERRY, WAIT BEFORE YOU ANSWER THE  
7 QUESTION.

8 Q BY MR. KOHLWECK: YOUR ANSWER IS "NO," SIR?

9 A YES.

10 Q I BELIEVE YOU STATED YESTERDAY THAT MR. WILHITE  
11 HAD MADE VARIOUS EVALUATIONS OF CERTAIN OF THE MATERIALS  
12 IN THE COLLECTION CALLED THE ARCHIVES; IS THAT CORRECT?

13 A HE MADE ONE THAT I KNOW OF.

14 Q DO YOU BELIEVE HIS ESTIMATES TO BE FAIR AND  
15 CORRECT APPROXIMATIONS OF THE VALUE OF THE MATERIALS THAT HE  
16 LOOKED AT, BASED UPON YOUR EXPERIENCE?

17 MS. DRAGOJEVIC: OBJECTION.

18 MR. KOHLWECK: ON WHAT GROUNDS?

19 MS. DRAGOJEVIC: ON FIFTH AMENDMENT GROUNDS.

20 MR. KOHLWECK: WELL, I'M SORRY. I AM NOT HOOKING UP  
21 ANY CHAIN OF EVIDENCE OR ANYTHING ELSE HERE. I AM SIMPLY  
22 ASKING HIS OPINION OF ANOTHER PERSON'S OPINION ABOUT VALUE.

23 MS. DRAGOJEVIC: I WOULD LIKE TO CONFER.

24 (DISCUSSION BETWEEN THE WITNESS  
25 AND HIS COUNSEL OUT OF THE HEARING  
26 OF THE REPORTER.)

27 MS. DRAGOJEVIC: ALL RIGHT. HE MAY ANSWER THE  
28 QUESTION.

1 THE WITNESS: I HAD NO WAY OF KNOWING. I'M NOT AN  
2 EXPERT IN THAT AREA.

3 Q BY MR. KOHLWECK: DID MR. WILHITE GIVE YOU  
4 CERTAIN APPRAISALS CONCERNING CERTAIN MATERIALS THAT YOU WERE  
5 PURCHASING --

6 MS. DRAGOJEVIC: OBJECTION.

7 MR. KOHLWECK: LET ME FINISH THE QUESTION, COUNSEL.

8 MS. DRAGOJEVIC: I THOUGHT YOU WERE FINISHED. EXCUSE  
9 ME.

10 Q BY MR. KOHLWECK: WITHIN YOUR SCOPE OF YOUR  
11 AUTHORITY AS THE ARCHIVIST WHEN YOU PURCHASED MATERIALS DID  
12 HE PROVIDE YOU WITH APPRAISALS?

13 MS. DRAGOJEVIC: I WOULD LIKE TO CONFER WITH MY CLIENT.

14 (DISCUSSION BETWEEN THE WITNESS  
15 AND HIS COUNSEL OUT OF THE HEARING  
16 OF THE REPORTER.)

17 MS. DRAGOJEVIC: I AM GOING TO OBJECT.

18 Q BY MR. KOHLWECK: ISN'T IT A FACT THAT AT ONE  
19 TIME MR. WILHITE WAS REQUESTED BY YOU TO GIVE AN APPROXIMATE  
20 VALUE OR AN APPRAISAL OF CERTAIN DOCUMENTS POSSESSED BY  
21 BARBARA SNADER, S-N-A-D-E-R, THAT YOU WISHED TO PURCHASE ON  
22 BEHALF OF THE CHURCH OF SCIENTOLOGY IN YOUR OFFICIAL  
23 CAPACITY?

24 MS. DRAGOJEVIC: OBJECTION.

25 MR. KOHLWECK: SAME GROUNDS?

26 MS. DRAGOJEVIC: YES.

27 MR. KOHLWECK: COUNSEL, I AM NOT TRYING TO QUIBBLE  
28 WITH YOU, BUT HERE I WILL REPRESENT WE ARE IN AN AREA OF

1 NONCRIMINAL ACTIVITY.

2 (DISCUSSION BETWEEN THE WITNESS  
3 AND HIS COUNSEL OUT OF THE HEARING  
4 OF THE REPORTER.)

5 MS. DRAGOJEVIC: CAN I HAVE THE QUESTION REREAD,  
6 PLEASE?

7 MR. KOHLWECK: CERTAINLY.

8 (RECORD READ BY REPORTER.)

9 (DISCUSSION BETWEEN THE WITNESS  
10 AND HIS COUNSEL OUT OF THE HEARING  
11 OF THE REPORTER.)

12 MS. DRAGOJEVIC: ALL RIGHT. HE CAN ANSWER THE  
13 QUESTION.

14 THE WITNESS: I DON'T RECALL.

15 Q BY MR. KOHLWECK: CAN YOU RECALL SAYING TO ANY  
16 PERSONS AT ANY TIME WHATSOEVER THAT COPIES OF S.O. 1 LETTERS  
17 WERE SELLING ON THE STREET IN HOLLYWOOD FOR \$100 A COPY?

18 AND BEFORE YOU ANSWER, DO YOU UNDERSTAND WHAT  
19 A "S.O. 1 LETTER" IS?

20 A YES.

21 Q USING WHATEVER DEFINITION YOU ARE USING, CAN YOU  
22 RECALL THE QUESTION?

23 A CAN I RECALL YOUR QUESTION?

24 Q YES.

25 LET'S STRIKE THE QUESTION. I CONFUSED YOU  
26 THERE.

27 DID YOU EVER MAKE A STATEMENT TO ANYONE AT ANY  
28 TIME THAT S.O. 1 LETTERS WERE SELLING ON HOLLYWOOD BOULEVARD

1 FOR \$100 A COPY?

2 (DISCUSSION BETWEEN THE WITNESS  
3 AND HIS COUNSEL OUT OF THE HEARING  
4 OF THE REPORTER.)

5 THE WITNESS: I DON'T RECALL THOSE EXACT WORDS. I DO  
6 RECALL SOMETHING TO THAT EFFECT.

7 Q BY MR. KOHLWECK: WOULD THAT PERSON HAVE BEEN  
8 TOM VORM, V-O-R-M?

9 A IT MAY HAVE BEEN.

10 Q CAN YOU RECALL YOUR PURPOSE IN MAKING A STATEMENT  
11 SIMILAR TO THE STATEMENT I HAVE MADE TO YOU ABOUT THE VALUE  
12 OF THE S.O. 1 LETTERS?

13 A I DON'T RECALL THE PURPOSE AT THIS TIME.

14 Q DO YOU RECALL IF IN YOUR CAPACITY AS THE  
15 ARCHIVIST YOU EVER SAW ANY PAPERS REFERRED TO AS THE GAUM  
16 PAPERS WITHIN THE COLLECTION?

17 A YES.

18 Q AND WHAT ARE OR WERE THE GAUM PAPERS?

19 A THOSE WERE AN ASSORTED BUNCH OF PAPERS, CARDS --  
20 THERE MAY HAVE BEEN A LETTER OR TWO -- WHICH, TO MY  
21 RECOLLECTION, COVERED THE PERIOD IN WHICH MR. HUBBARD OR HIS  
22 PARENTS WERE IN GAUM.

23 Q WOULD THIS HAVE BEEN THE TIME THAT MR. HARRY  
24 HUBBARD WAS STATIONED ON GAUM IN THE QUARTERMASTER CORPS  
25 AND HIS YOUNG SON, L. RON HUBBARD, CAME TO VISIT HIM FOR A  
26 SUMMER, IF YOU KNOW?

27 A I DON'T KNOW.

28 Q ARE YOU FAMILIAR WITH THE NAME JOHN W. CAMPBELL?

1 A YES.

2 Q C-A-M-P-B-E-L-L, I BELIEVE.

3 AND WHO IS MR. JOHN CAMPBELL?

4 A JOHN W. CAMPBELL WAS THE EDITOR OF ASTOUNDING  
5 SCIENCE FICTION MAGAZINE UP UNTIL, I BELIEVE, THE SIXTIES  
6 FROM THE THIRTIES.

7 Q WERE VARIOUS MATERIALS AND LETTERS FROM AND TO  
8 MR. CAMPBELL CONTAINED WITHIN THE ARCHIVES COLLECTION WHILE  
9 YOU WERE THE ARCHIVIST?

10 (DISCUSSION BETWEEN THE WITNESS  
11 AND HIS COUNSEL OUT OF THE HEARING  
12 OF THE REPORTER.)

13 THE WITNESS: YES.

14 Q BY MR. KOHLWECK: HAVE YOU AT ANY TIME MADE COPIES  
15 OF ANY OF THOSE LETTERS FOR YOUR OWN USE OR TO BE PROVIDED  
16 TO YOUR ATTORNEYS?

17 MS. DRAGOJEVIC: OBJECTION.

18 Q BY MR. KOHLWECK: ARE YOU FAMILIAR WITH A FILE  
19 LOCATED WITHIN THE ARCHIVES COLLECTION KNOWN AS "VITA,"  
20 V-I-T-A?

21 A YES.

22 Q AND TO THE BEST OF YOUR RECOLLECTION, WHAT WERE  
23 OR ARE THE CONTENTS OF THE VITA FILE?

24 A THEY ARE LETTERS FROM SOMEONE TO MR. HUBBARD.

25 Q DO YOU KNOW WHO THAT SOMEONE IS?

26 A NO.

27 Q DO YOU KNOW IF IT IS A MALE OR A FEMALE PERSON?

28 A I BELIEVE IT IS A FEMALE. I DO NOT KNOW. I

1 BELIEVE IT IS.

2 MS. DRAGOJEVIC: WE DON'T WANT YOU TO GUESS AT ANYTHING,  
3 GERRY. IF YOU DON'T HAVE A CLEAR RECOLLECTION WHETHER IT  
4 IS A MALE OR FEMALE, IT WOULD BE BETTER IF YOU INDICATED THAT  
5 YOU DIDN'T KNOW.

6 THE WITNESS: THEN, I DON'T KNOW.

7 Q BY MR. KOHLWECK: ARE YOU FAMILIAR WITH CERTAIN  
8 ALLEGATIONS THAT MR. HUBBARD MAY AT ONE TIME HAVE BEEN A  
9 BIGAMIST?

10 A YES.

11 Q WITHIN THE ARCHIVES COLLECTION WERE FILE MATERIALS  
12 KEPT BY YOURSELF OR OTHERS CONCERNING THE MARRIAGE OF  
13 L. RON HUBBARD, LOUISE GRUBB HUBBARD AND THE DIVORCE  
14 PROCEEDINGS RELATING TO THAT MARRIAGE?

15 A PLEASE REREAD THE QUESTION OR RESTATE IT.

16 Q DO YOU WISH TO HAVE IT REREAD, OR DID I CONFUSE  
17 YOU WITH SOME PART OF THE QUESTION AND SHOULD I RESTATE  
18 IT?

19 A YOU CAN RESTATE IT. THAT IS FINE.

20 Q WHILE YOU WERE THE ARCHIVIST, WAS THERE A FILE  
21 CONTAINED WITHIN THE ARCHIVES RELATING TO THE MARRIAGE  
22 BETWEEN L. RON HUBBARD AND LOUISE GRUBB HUBBARD AND DIVORCE  
23 PROCEEDINGS CONCERNING THAT MARRIAGE?

24 A YES.

25 Q HAVE YOU AT ANY TIME MADE COPIES OF ANY OF THE  
26 PAPERS CONTAINED IN THOSE FILE MATERIALS?

27 MS. DRAGOJEVIC: OBJECTION.

28 Q BY MR. KOHLWECK: CONTAINED WITHIN THE ARCHIVES

1 COLLECTION WAS THERE A FILE KNOWN AS "CONFIDENTIAL TAX  
2 FILES OF L.R.H.," IF YOU KNOW?

3 A YES.

4 Q HAVE YOU AT ANY TIME REVIEWED THE CONTENTS OF  
5 THAT FILE?

6 A I DO NOT BELIEVE SO.

7 Q HAVE YOU AT ANY TIME MADE COPIES OF THE MATERIALS  
8 CONTAINED WITHIN THAT FILE?

9 A YES.

10 Q HAVE YOU PROVIDED COPIES OF THOSE MATERIALS TO  
11 ANYONE?

12 MS. DRAGOJEVIC: OBJECTION.

13 Q BY MR. KOHLWECK: ARE YOU FAMILIAR WITH THE NAME  
14 KATY, I BELIEVE, K-A-T-Y, GILLESPIE, G-I-L-L-E-S-P-I-E?

15 A YES.

16 Q WHO IS KATY GILLESPIE?

17 A KATY GILLESPIE IS THE DAUGHTER OF L. RON  
18 HUBBARD FROM HIS FIRST MARRIAGE.

19 Q CONTAINED WITHIN THE ARCHIVE COLLECTION WAS THERE  
20 A SERIES OF CORRESPONDENCE CONTAINED FOR THE YEARS 1956  
21 THROUGH 1968, IF YOU KNOW?

22 A I DON'T RECALL.

23 Q WITHIN THE ARCHIVES COLLECTION WAS THERE A FILE  
24 ENTITLED "WHITE HOUSE/RUSSIANS CORRESPONDENCE WITH  
25 MR. NIXON"?

26 A YES.

27 Q DID YOU REVIEW THE CONTENTS OF THAT FILE?

28 A I BELIEVE I LOOKED AT A COUPLE OF DOCUMENTS WITHIN



1 THAT FILE.

2 Q WHAT DO YOU RECALL THOSE DOCUMENTS TO BE?

3 A I DON'T RECALL.

4 Q CAN YOU RECALL IF THERE WAS ANY F.B.I. MATERIAL  
5 CONTAINED WITHIN THAT FILE?

6 A I DON'T RECALL.

7 Q CAN YOU RECALL IF COPIES OF THAT FILE HAD BEEN  
8 MADE AND PROVIDED TO YOUR ATTORNEYS?

9 (DISCUSSION BETWEEN THE WITNESS  
10 AND HIS COUNSEL OUT OF THE HEARING  
11 OF THE REPORTER.)

12 MS. DRAGOJEVIC: OBJECTION.

13 Q BY MR. KOHLWECK: CAN YOU RECALL IF WITHIN THE  
14 ARCHIVES COLLECTION THERE WAS A TWENTIETH MARINES YEAR  
15 BOOK FOR THE YEARS 1930 TO 1931?

16 A YES.

17 Q CAN YOU RECALL IF YOU REVIEWED THE MARINE CORPS  
18 YEAR BOOK FOR THOSE YEARS?

19 A YES.

20 Q DO YOU KNOW IF MR. HUBBARD CLAIMED TO BE IN THE  
21 MARINE CORPS AT ANY POINT IN TIME?

22 A I'M NOT SURE HOW TO ANSWER THAT.

23 Q DO YOU BELIEVE THAT MR. HUBBARD HAS MISREPRESENTED  
24 THE FACT OR THAT PERSONS ACTING ON BEHALF OF MR. HUBBARD  
25 HAVE MISREPRESENTED THE FACT THAT HE AT ONE TIME WAS IN THE  
26 MARINE CORPS?

27 MS. DRAGOJEVIC: OBJECTION; COMPOUND.

28 Q BY MR. KOHLWECK: DO YOU BELIEVE THAT THERE HAS

1 BEEN MISREPRESENTATION CONCERNING A STATEMENT THAT MR. HUBBARD  
2 HAS BEEN IN THE MARINE CORPS?

3 A I DON'T KNOW.

4 MS. DRAGOJEVIC: I AM GOING TO OBJECT TO THAT QUESTION,  
5 ANYWAY, AS BEING VAGUE AND AMBIGUOUS. I DON'T KNOW WHAT  
6 YOU MEAN BY "A STATEMENT BEING MADE."

7 MR. KOHLWECK: WE WILL USE THE SAME PARLANCE THAT IS  
8 CONTAINED WITHIN PARAGRAPH 8 OF PLAINTIFF'S 3, AS FAR AS  
9 STATEMENTS BEING MADE, WHICH IS AUTHORED, I BELIEVE, BY  
10 MR. ARMSTRONG.

11 Q ARE YOU FAMILIAR WITH A FILE BEING KEPT IN THE  
12 ARCHIVES COLLECTION ENTITLED "BIOGRAPHY, AN ASSORTED HYPE,  
13 VARIOUS BIOGRAPHIES OF L.R.H."?

14 A YES.

15 Q DO YOU KNOW WHO GAVE THE ABOVE READ TITLE TO THAT  
16 FILE?

17 A I BELIEVE I DID.

18 Q DID YOU REVIEW THE CONTENTS AT ANY TIME OF THAT  
19 FILE?

20 A YES.

21 Q DID YOU READ EACH ENTRY PLACED IN THAT FILE?

22 A I DON'T RECALL.

23 Q DID YOU DO ANY RESEARCH CONCERNING VARIOUS  
24 STATEMENTS CONTAINED IN PAPERS PLACED WITHIN THAT FILE?

25 A I BELIEVE SO.

26 Q DID YOU FIND THAT THE VARIOUS BIOGRAPHIES  
27 CONTAINED MISSTATEMENTS OR MISREPRESENTATIONS?

28 A YES.

1 Q HAVE YOU MADE THESE MISREPRESENTATIONS OR  
2 MISSTATEMENTS KNOWN TO ANY OTHER PARTY?

3 A YES.

4 Q WHO ARE THOSE PERSONS THAT YOU HAVE MADE THESE  
5 STATEMENTS OR MISREPRESENTATIONS KNOWN TO?

6 (DISCUSSION BETWEEN THE WITNESS  
7 AND HIS COUNSEL OUT OF THE HEARING  
8 OF THE REPORTER.)

9 THE WITNESS: TO THE BEST OF MY RECOLLECTION, I MADE  
10 KNOWN VARIOUS OF THE INACCURACIES TO INDIVIDUALS WITHIN THE  
11 ORGANIZATION.

12 Q BY MR. KOHLWECK: DID YOU EVER MAKE THESE  
13 INACCURACIES KNOWN TO MR. GARRISON?

14 (DISCUSSION BETWEEN THE WITNESS  
15 AND HIS COUNSEL OUT OF THE HEARING  
16 OF THE REPORTER.)

17 THE WITNESS: I DON'T BELIEVE SO.

18 Q BY MR. KOHLWECK: WHO ARE THE INDIVIDUALS WITHIN  
19 THE ORGANIZATION THAT YOU MADE THESE INACCURACIES OR  
20 MISSTATEMENTS KNOWN TO?

21 A I WOULD HAVE TO REVIEW THE FILE --

22 A SECRETARY: MICHAEL FLYNN ON THE PHONE FOR JULIA.

23 MR. KOHLWECK: WHY DON'T WE TAKE A BREAK HERE.

24 (BRIEF RECESS.)

25 (RECORD READ BY REPORTER.)

26 THE WITNESS: SHALL I CONTINUE?

27 MS. DRAGOJEVIC: WAS THAT THE EXTENT OF YOUR ANSWER?

28 THE WITNESS: I WOULD HAVE TO REVIEW THAT PARTICULAR

1 FILE AND OTHER FILES. THERE WERE -- I MADE THESE  
2 INACCURACIES KNOWN ON A NUMBER OF OCCASIONS.

3 Q BY MR. KOHLWECK: IF YOU CANNOT REMEMBER THE NAMES  
4 OF THE INDIVIDUALS WITHIN THE ORGANIZATION, CAN YOU REMEMBER  
5 THE POST OF THE INDIVIDUALS YOU WOULD HAVE MADE THESE  
6 INACCURACIES OR MISSTATEMENTS KNOWN TO?

7 A LIKELY JULIA WATSON, VARIOUS C.M.O. POSTS.

8 Q HAVE YOU ON ANY OF THESE OCCASIONS MADE THESE  
9 MISSTATEMENTS OR INACCURACIES KNOWN TO ANYONE OUTSIDE OF THE  
10 CHURCH OF SCIENTOLOGY?

11 A AS I DON'T HAVE THE FILE WITH ME AND THE VARIOUS  
12 DOCUMENTS IT CONTAINS WITH ME, I AM NOT ABLE TO ANSWER  
13 THAT.

14 Q DOES THAT MEAN YOU CANNOT RECALL MAKING SUCH  
15 STATEMENTS TO ANYONE ELSE OUTSIDE OF THE CHURCH OF  
16 SCIENTOLOGY?

17 MS. DRAGOJEVIC: AS YOU SIT HERE TODAY WITHOUT THE FILE  
18 IN FRONT OF YOU.

19 THE WITNESS: YES.

20 Q BY MR. KOHLWECK: WOULD THE FILE CONTAIN NOTES  
21 THAT WOULD HELP TO REFRESH YOUR RECOLLECTION OF WHO YOU MAY  
22 HAVE COMMUNICATED WITH?

23 MS. DRAGOJEVIC: DO YOU UNDERSTAND THE QUESTION,  
24 GERRY?

25 THE WITNESS: NO.

26 Q BY MR. KOHLWECK: WHY WOULD LOOKING AT THAT FILE  
27 REFRESH YOUR RECOLLECTION? ARE THERE SOME NOTES OR SOMETHING  
28 IN THERE THAT MAY BE HELPFUL TO YOUR MEMORY?

1           A       THE DOCUMENTS THEMSELVES WOULD BE HELPFUL TO MY  
2 MEMORY.

3           Q       TO THE BEST OF YOUR KNOWLEDGE AND RECOLLECTION,  
4 WAS A FILE EVER CONTAINED WITHIN THE ARCHIVES ENTITLED  
5 "L.V.M.P.D. REPORTS"?

6           A       YES.

7           Q       AND WHAT DOES "L.V.M.P.D." STAND FOR?

8           A       LAS VEGAS METROPOLITAN POLICE DEPARTMENT.

9           Q       NOW, IT APPEARS FROM THE NOTES I HAVE THAT THE  
10 LETTER "Q" WAS ALSO PART OF THAT FILE.

11           Q       DOES "Q" HAVE A SPECIAL MEANING?

12           A       "Q" MEANS QUENTIN.

13           Q       AND THAT WAS QUENTIN HUBBARD?

14           A       YES.

15           Q       ONE OF MR. HUBBARD'S CHILDREN?

16           A       YES.

17           Q       DO YOU KNOW WHAT THE CONTENTS OF THESE FILES WERE --  
18 QUENTIN FILE AND LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
19 FILE?

20           A       YES. THOSE WERE FILES -- THOSE WERE DOCUMENTS  
21 OF EITHER POLICE REPORTS OR SHERIFF REPORTS OR GUARDIAN  
22 OFFICE MEMO REPORTS CONCERNING THE DEATH OF QUENTIN HUBBARD.

23           Q       DO YOU KNOW WHY THESE PARTICULAR PAPERS WERE  
24 PART OF THE ARCHIVES COLLECTION?

25           A       AT THE REQUEST OF OMAR GARRISON.

26           Q       PRIOR TO HIS REQUEST, THEY WERE NOT PART OF THE  
27 ARCHIVES COLLECTION; IS THAT CORRECT?

28           A       THAT'S CORRECT. THEY NEVER WERE ACTUALLY PART OF

1 ARCHIVES. I COPIED THEM -- I WAS GIVEN THEM BY THE  
2 GUARDIAN'S OFFICE, AND I COPIED THEM FOR MR. GARRISON.

3 Q TO THE BEST OF YOUR KNOWLEDGE, HAVE COPIES BEEN  
4 MADE AND FURNISHED TO ANY OTHER PERSON, OTHER THAN  
5 MR. GARRISON, WHO IS OUTSIDE THE CHURCH OF SCIENTOLOGY OF  
6 CALIFORNIA?

7 A I DON'T RECALL.

8 Q HAVE YOU AT ANY TIME REQUESTED THAT MR. GARRISON  
9 PROVIDE YOU WITH THESE DOCUMENTS SO THAT YOU MIGHT COPY  
10 THEM?

11 A NO.

12 Q HAS MR. GARRISON AT ANY TIME REQUESTED THAT YOU  
13 MAKE COPIES OF THESE DOCUMENTS?

14 A YES.

15 Q AND WERE ALL COPIES THUS MADE PROVIDED TO  
16 MR. GARRISON?

17 A I DON'T RECALL.

18 Q ARE YOU FAMILIAR WITH ANOTHER FILE WITHIN THE  
19 ARCHIVES PROJECT ENTITLED "Q. KARRAS (K-A-R-R-A-S) REPORT"?

20 A YES.

21 Q AND WHAT WAS THE Q. KARRAS REPORT CONCERNING?

22 A THAT CONCERNED THE SAME SUBJECT, QUENTIN HUBBARD.

23 Q IS KARRAS A PERSON, IF YOU KNOW?

24 A I BELIEVE SO.

25 Q WERE YOU RESPONSIBLE FOR TITLING THIS SECTION  
26 OF MATERIALS OF THE ARCHIVES?

27 A I BELIEVE SO.

28 Q CAN YOU RECALL WHO OR WHAT MR. OR MRS. OR MS. KARRAS

1 WAS?

2 A TO THE BEST OF MY RECOLLECTION, HE OR SHE WAS AN  
3 INVESTIGATOR.

4 Q ARE YOU FAMILIAR WITH A SCIENTOLOGICAL TERM  
5 "COUNTERINTENTION"?

6 A YES.

7 Q WHAT DOES "COUNTERINTENTION" MEAN?

8 A THAT MEANS AN INTENTION WHICH COUNTERS OR GOES  
9 AGAINST ANY OTHER INTENTION.

10 Q DOES "COUNTERINTENTION" ALSO INCLUDE CONDUCT OR  
11 STATE OF MIND THAT IS CONTRARY TO THE INSTRUCTIONS OF A  
12 SUPERIOR OR THE POLICIES OF THE CHURCH OF SCIENTOLOGY?

13 A IT COULD MEAN THAT.

14 Q DID YOU EVER HAVE COUNTERINTENTION WHEN YOU WERE  
15 THE ARCHIVIST CONCERNING YOUR PROJECT AND THE L.R.H.  
16 BIOGRAPHY?

17 A IN ORDER TO ANSWER THAT YOU WOULD HAVE TO EXPLAIN  
18 TO ME WHAT THE INTENTION WAS AT ANY GIVEN TIME.

19 Q DID YOU UNDERSTAND THERE TO BE AN INTENTION  
20 BEHIND THE BIOGRAPHY PROJECT?

21 A YES.

22 Q AND IS IT NOT A FACT THAT YOU AUTHORED A  
23 NONEXISTENCE FORMULA CONCERNING THE BIOGRAPHY PROJECT?

24 A YES.

25 Q AND IS IT NOT A FACT THAT NONEXISTENCE FORMULA  
26 WAS REVIEWED AND APPROVED BY SUPERIORS?

27 A I DON'T BELIEVE THAT THE USE OF THE WORD  
28 "APPROVED" WOULD BE APPROPRIATE THERE.

1 Q WHAT TERM WOULD BE APPROPRIATE THERE?

2 A IN ORDER TO ANSWER THAT I WOULD HAVE TO SEE THE  
3 PARTICULAR NONEXISTENCE FORMULAS WHICH I SUBMITTED TO  
4 VARIOUS ORGANIZATION PERSONNEL, AND I WOULD HAVE TO SEE THEIR  
5 RESPONSES.

6 Q WHEN YOU TOOK ON THE POST OF ARCHIVIST, WERE  
7 THERE SPECIFIC OBJECTIVES THAT YOU WERE EXPECTED TO  
8 ACCOMPLISH WHILE HOLDING THAT POST?

9 A YES.

10 Q WERE YOU AT ANY TIME COUNTERINTENTION TO THOSE  
11 OBJECTIVES?

12 A NO.

13 Q WHAT DID YOU UNDERSTAND THOSE OBJECTIVES TO BE?

14 A THE CREATION OF AN ACCURATE BIOGRAPHY.

15 Q WAS ONE OF THE OBJECTIVES ALSO THE CREATION OF  
16 AN AUTHORIZED BIOGRAPHY?

17 MS. DRAGOJEVIC: OBJECTION. THAT IS AMBIGUOUS. I  
18 DON'T KNOW WHAT YOU MEAN BY THE WORD "AUTHORIZED."

19 Q BY MR. KOHLWECK: DO YOU KNOW WHAT THE TERM  
20 "AUTHORIZED" MEANS?

21 MS. DRAGOJEVIC: IN WHAT SENSE? IN ITS EVERYDAY  
22 DICTIONARY SENSE, OR IS THERE SOME SPECIAL SCIENTOLOGICAL  
23 SENSE --

24 MR. KOHLWECK: WELL, WE CAN GO FORWARD FROM WEBSTER'S,  
25 AND THEN WE CAN GO INTO THE TECH OR ADMIN DICTIONARY. BUT  
26 I WILL DO IT THROUGH THE WITNESS' TESTIMONY.

27 MS. DRAGOJEVIC: CAN YOU RECALL THE LAST QUESTION,  
28 GERRY?



1 THE WITNESS: YEAH.

2 IT WOULD BE BEST IF YOU REPEAT IT.

3 Q BY MR. KOHLWECK: DO YOU KNOW WHAT THE TERM  
4 "AUTHORIZED" MEANS?

5 A YES.

6 Q WHAT DOES THE TERM "AUTHORIZED" MEAN TO YOU?

7 A ACCEPTED, APPROVED.

8 Q ALL RIGHT. USING THAT DEFINITION, WAS ONE OF THE  
9 OBJECTIVES OF YOUR POST THE COMPLETION OF AN AUTHORIZED  
10 BIOGRAPHY OF L. RON HUBBARD?

11 MS. DRAGOJEVIC: I OBJECT. THE QUESTION IS STILL  
12 VAGUE AND AMBIGUOUS IN THAT I DON'T UNDERSTAND WHAT YOU  
13 MEAN BY "AUTHORIZED." DO YOU HAVE A SPECIFIC PERSON IN  
14 MIND? DO YOU HAVE A SPECIFIC GROUP OF INDIVIDUALS IN MIND?  
15 I DON'T UNDERSTAND WHAT YOU ARE GETTING AT.

16 MR. KOHLWECK: ALL RIGHT. LET'S TRY IT FROM ANOTHER  
17 APPROACH.

18 Q YOU WORKED WITH MR. GARRISON FOR HOW LONG?

19 A APPROXIMATELY A YEAR AND A HALF.

20 Q AND MR. GARRISON IS AN AUTHOR, IS HE NOT?

21 A YES.

22 Q DID YOU AND MR. GARRISON EVER HAVE DISCUSSIONS  
23 CONCERNING WHAT CONSTITUTES A BIOGRAPHY?

24 A YES.

25 Q DO YOU KNOW WHAT AN AUTOBIOGRAPHY IS?

26 A YES.

27 Q WHAT IS THE DIFFERENCE BETWEEN A BIOGRAPHY AND  
28 AND AN AUTOBIOGRAPHY?

1           A       AN AUTOBIOGRAPHY IS A BIOGRAPHY WRITTEN BY THE  
2 SUBJECT HIMSELF.

3           Q       AND, THEREFORE, A BIOGRAPHY IS WRITTEN BY  
4 SOMEONE OTHER THAN THE SUBJECT HIMSELF?

5           A       THAT IS TRUE.

6           Q       DO YOU KNOW FROM THOSE TWO DEFINITIONS WHAT AN  
7 AUTHORIZED BIOGRAPHY IS?

8           A       YES.

9           Q       AND WHAT IS THAT?

10          A       IT IS A BIOGRAPHY WHICH IS AUTHORIZED BY THE  
11 SUBJECT.

12          Q       IS THERE ANYTHING IMPLIED IN THAT AUTHORIZATION  
13 ACCORDING TO YOUR UNDERSTANDING OF THE TERM?

14          A       I DON'T FOLLOW THAT.

15          Q       IS THE SUBJECT OF THE BIOGRAPHY OR THE PERSON  
16 CONTRACTING FOR THE WRITING OF THE BIOGRAPHY, IF THEY ARE  
17 AUTHORIZING IT, ENTITLED TO REVIEW THE DOCUMENT AND ITS  
18 CONTENTS, ACCORDING TO YOUR UNDERSTANDING?

19          A       YES.

20          Q       NOW, YOU USED THE TERM EARLIER THAT YOU SAW YOUR  
21 POST TO BE THE PRODUCTION OF AN ACCURATE BIOGRAPHY. MY  
22 QUESTION NOW, WAS ONE OF YOUR OBJECTIVES ON POST THE  
23 PRODUCTION OF AN AUTHORIZED BIOGRAPHY?

24          A       YES.

25          Q       WERE YOU EVER COUNTERINTENTION TO THE PRODUCTION  
26 OF AN AUTHORIZED BIOGRAPHY?

27          A       NO.

28          Q       ARE YOU FAMILIAR WITH AN INDIVIDUAL NAMED

1 GENE METHVIN, M-E-T-H-V-I-N?

2 A I'VE HEARD THE NAME.

3 Q AND IN WHAT CONTEXT HAVE YOU HEARD THE NAME?

4 A THAT HE AUTHORED TWO ARTICLES IN THE READER'S  
5 DIGEST.

6 Q AND WHO TOLD YOU ABOUT MR. METHVIN'S ARTICLES?

7 A I READ THEM IN THE READER'S DIGEST.

8 Q DURING WHAT TIME PERIOD DID YOU READ THESE  
9 ARTICLES?

10 A DURING 1981.

11 Q HAVE YOU EVER AT ANY TIME HAD ANY COMMUNICATION  
12 EITHER DIRECTLY OR THROUGH OTHERS WITH MR. METHVIN?

13 A NONE THAT I'M AWARE OF.

14 Q HAVE YOU AT ANY TIME, EITHER DIRECTLY OR THROUGH  
15 OTHERS, HAD ANY COMMUNICATION WHATSOEVER WITH ANY MEMBER OF  
16 THE READER'S DIGEST STAFF?

17 A NO.

18 Q HAVE YOU AT ANY TIME IN THE LAST YEAR AND A HALF  
19 BEEN CONTACTED BY ANYONE ASSOCIATED WITH NETWORK TELEVISION,  
20 ABC'S 20/20 PROGRAM?

21 A YES.

22 Q AND ON WHAT OCCASION WAS THAT?

23 A THAT WAS ON -- THAT WAS ABOUT TWO MONTHS AGO.

24 Q WHERE WAS THAT CONTACT?

25 A THAT WAS IN A HOTEL IN LOS ANGELES.

26 Q WHO WAS THE CONTACT OR CONTACTS?

27 A THAT WAS GORDON FREEDMAN.

28 Q WAS THERE ANYONE ELSE PRESENT DURING THAT MEETING

1 OR COMMUNICATION?

2 A AT ONE TIME THERE WERE PRESENT MICHAEL FLYNN,  
3 JULIA DRAGOJEVIC, JIM DINCALCI, AND NANCY DINCALCI, MICHAEL  
4 DOUGLAS, KIMA DOUGLAS.

5 Q ANYONE ELSE PRESENT?

6 A THERE WAS SOMEONE ELSE WHOSE NAME I DO NOT  
7 RECALL.

8 Q DO YOU RECALL MY QUESTION YESTERDAY ON WHICH  
9 OCCASIONS YOU HAVE MET WITH MR. MICHAEL FLYNN AND YOUR ANSWER  
10 WAS: ONE TIME ONLY IN THE CITY OF CLEARWATER TOWARDS  
11 THE END OF APRIL?

12 DO YOU WISH TO REVISE THAT ANSWER NOW?

13 A THAT'S CORRECT.

14 Q YOU HAVE ONLY MET WITH MR. FLYNN ON THAT ONE  
15 OCCASION?

16 A NO, I'M SORRY. IF I SAID THAT, IT WAS  
17 INACCURATE AT THE TIME. THERE WAS THIS OTHER INSTANCE.

18 Q HAVE THERE BEEN --

19 PARDON ME. GO AHEAD.

20 A NO, THAT IS OKAY.

21 Q HAVE THERE BEEN ANY OTHER INSTANCES?

22 A NO.

23 Q WAS ANYONE PRESENT AT THIS MEETING WITH 20/20  
24 IN LOS ANGELES TWO MONTHS AGO THAT MADE A CLAIM OF  
25 CONFIDENTIALITY?

26 DO YOU UNDERSTAND MY QUESTION?

27 A NO.

28 Q DID ANYONE SAY, "THIS MEETING IS OFF THE RECORD,

1 IT IS ATTORNEY-CLIENT PRIVILEGE"?

2 (DISCUSSION BETWEEN THE WITNESS  
3 AND HIS COUNSEL OUT OF THE HEARING  
4 OF THE REPORTER.)

5 Q BY MR. KOHLWECK: THE QUESTION IS PENDING.

6 A ALL RIGHT. I DON'T RECALL, BUT HE MAY HAVE.

7 Q WHO IS "HE"?

8 A MICHAEL FLYNN. AND IT WAS UNDERSTOOD BY ALL  
9 PRESENT.

10 Q DO YOU KNOW IF EACH OF THE PARTIES THAT YOU HAVE  
11 NAMED, WHICH ARE THE DINCALCIS AND THE OTHERS, WHETHER  
12 THEY ARE CLIENTS OF MS. DRAGOJEVIC OR MR. FLYNN?

13 A I DON'T KNOW.

14 Q DO YOU KNOW IF ALL OF THE REPORTERS AND NETWORK  
15 PEOPLE ARE CLIENTS OF EITHER MS. DRAGOJEVIC OR MR. FLYNN?

16 A I DON'T KNOW.

17 Q DO YOU KNOW FOR A FACT THEY ARE NOT CLIENTS, ANY  
18 OF THOSE PERSONS REFERRED TO IN MY LAST TWO PREVIOUS  
19 QUESTIONS?

20 A NO, I DON'T.

21 Q WERE ANY RECORDINGS MADE DURING THIS MEETING?  
22 AND BY "RECORDINGS," I MEAN AUDIO OR VIDEO.

23 A NOT TO MY KNOWLEDGE.

24 Q HAVE YOU AT ANY TIME BEEN INTERVIEWED AND RECORDED  
25 BY ANYONE REPRESENTING ABC AND THEIR 20/20 PROGRAM?

26 A YES, I HAVE.

27 Q AND ON WHAT OCCASION WAS THAT?

28 A THIS WAS A SUBSEQUENT MEETING PERHAPS A MONTH

1       **LATER.**

2           Q       WHERE WAS IT?

3           A       IN, I BELIEVE, BEVERLY HILLS.

4           Q       WHERE IN BEVERLY HILLS?

5           A       I'M SORRY.    IN WESTWOOD.

6                    IN A HOTEL.

7           Q       WHICH HOTEL WAS THAT?

8           A       I DON'T RECALL.

9           Q       WAS IT ON WILSHIRE BOULEVARD?

10          A       I DON'T BELIEVE SO.

11          Q       WAS IT ON WESTWOOD BOULEVARD?

12          A       I DON'T RECALL.

13          Q       WAS IT A HIGH-RISE STRUCTURE?

14          A       YES.

15          Q       WHO WAS PRESENT AT THAT MEETING?

16          A       MY WIFE, GORDON FREEDMAN, THE INTERVIEWER AND  
17       **CREW.**

18          Q       APPROXIMATELY HOW LONG DID THIS MEETING TAKE  
19       **PLACE?**

20          A       APPROXIMATELY AN HOUR.

21          Q       WHO WAS THE INTERVIEWER?

22          A       JOHN STOSSEL.

23          Q       WHAT WAS THE SUBJECT MATTER OF THE INTERVIEW?

24          A       WHAT OCCURRED TO ME SUBSEQUENT TO GETTING OUT OF  
25       **THE ORGANIZATION, FOR WHAT REASON I FELT I WAS BEING**  
26       **HARASSED BY THE ORGANIZATION. AND WE TOOK UP THE MATTER OF**  
27       **THE PHOTOGRAPHS WHICH WERE TAKEN BY THE ORGANIZATION. WE**  
28       **TOOK UP MY VIEWS AS TO WHETHER OR NOT THE ORGANIZATION WAS**

1 CONTINUING ITS PRACTICES OF HARASSMENT OF INDIVIDUALS OR IF  
2 THEY WERE INDEED CHANGED, AS THEY WERE CLAIMING. WE TOOK UP  
3 MY VIEWS AS TO THE MISREPRESENTATIONS MADE BY MR. HUBBARD AS  
4 TO HIS BACKGROUND.

5 THAT WAS PRINCIPALLY IT.

6 Q OUTSIDE OF THE INCIDENT CONCERNING THE  
7 PHOTOGRAPHS, WHICH I BELIEVE WE FULLY IDENTIFIED YESTERDAY,  
8 WHAT AREAS OF HARASSMENT CONCERNING YOURSELF OR YOUR WIFE  
9 DO YOU CLAIM TO HAVE OCCURRED SINCE YOU LEFT THE CHURCH OF  
10 SCIENTOLOGY?

11 A I MENTIONED THE TWO DECLARES AND I MENTIONED THE  
12 PHOTOS.

13 Q ARE THERE ANY OTHER ITEMS OF HARASSMENT OF WHICH  
14 YOU ARE AWARE?

15 MS. DRAGOJEVIC: THIS LAWSUIT.

16 MR. KOHLWECK: WHEN I GET THE INJUNCTION, COUNSEL, I  
17 THINK YOU WILL SEE LOTS OF PROBABLE CAUSE IN THIS LAWSUIT.

18 Q ANY OTHER ITEMS, MR. ARMSTRONG?

19 A I DON'T RECALL WHAT ELSE I TOOK UP AT THAT TIME.

20 Q IS IT AN UNUSUAL PRACTICE OF THE CHURCH OF  
21 SCIENTOLOGY TO ISSUE A DECLARE ON A PERSON WHO HAS LEFT THE  
22 CHURCH, IF YOU KNOW?

23 A I BELIEVE IT TO BE.

24 Q DID YOU, THEREFORE, BELIEVE THAT YOU WERE  
25 SINGLED OUT BY THE DECLARE ON YOURSELF?

26 A YES.

27 Q NOW, GOING BACK TO THE PREVIOUS MEETING WITH  
28 20/20, WHAT WAS THE TOPIC OF CONVERSATION AT THAT MEETING OR

1 TOPICS?

2 A AT THAT TIME WE DISCUSSED THE POSSIBILITY OF  
3 DOING A VIDEOED INTERVIEW.

4 Q WERE ANY OTHER TOPICS DISCUSSED?

5 MS. DRAGOJEVIC: I AM GOING TO OBJECT. THE QUESTION  
6 IS RATHER VAGUE AND AMBIGUOUS IN YOUR NOT INDICATING BETWEEN  
7 WHAT INDIVIDUALS, AT WHAT POINT IN TIME. I SIMPLY DON'T  
8 UNDERSTAND WHAT YOU ARE GETTING AT. ARE YOU TALKING ABOUT  
9 EVERY SINGLE CONVERSATION THAT WAS HELD IN THE ROOM? SOME  
10 OF THE CONVERSATIONS MAY BE PROTECTED BY ATTORNEY-CLIENT  
11 PRIVILEGE FOR ONE REASON OR ANOTHER, IN THAT SOME OF THESE  
12 INDIVIDUALS MAY HAVE BEEN SEEKING THE ADVICE OF COUNSEL AT  
13 THE TIME THESE CONFERENCES TOOK PLACE.

14 MR. KOHLWECK: IN FRONT OF NETWORK CORRESPONDENCE,  
15 COUNSEL? SURELY, YOU JEST.

16 MS. DRAGOJEVIC: THERE HAS BEEN NO TESTIMONY THAT  
17 NETWORK INDIVIDUALS WERE PRESENT IN THAT ROOM THE ENTIRE  
18 TIME THE CONFERENCE TOOK PLACE.

19 MR. KOHLWECK: OKAY. WE CAN DO THIS THE HARD WAY.

20 Q AT ALL TIMES THAT NETWORK OFFICIALS, STAFF  
21 MEMBERS, AGENTS, REPRESENTATIVES, OR ANYONE ELSE IN ANY  
22 MANNER OR MEANS WHATSOEVER AFFILIATED WITH ABC WERE PRESENT  
23 IN THE ROOM, WHAT WERE THE TOPICS OF CONVERSATION, STARTING  
24 WITH THE FIRST ONE THAT YOU CAN RECALL?

25 A THE MAIN TOPIC OF CONVERSATION WAS THE POSSIBILITY  
26 OF DOING A FILMED INTERVIEW AND --

27 MR. KOHLWECK: LET THE RECORD REFLECT COUNSEL JUST  
28 TOUCHED THE DEPONENT ON HIS ARM.



1 MS. DRAGOJEVIC: I DID NO SUCH THING.

2 THE WITNESS: THAT IS NOT TRUE. I WAS NOT TOUCHED IN  
3 ANY WAY.

4 Q BY MR. KOHLWECK: KEEP GOING WITH YOUR ANSWER,  
5 IF YOU HAVE MORE TO ADD.

6 A I TALKED -- WHEN I WAS TALKING TO MR. FREEDMAN,  
7 I INFORMED HIM OF THE JOB WHICH I HAD HAD DURING THE COURSE  
8 OF THE ARCHIVES PROJECT AND WHAT HAD HAPPENED TO ME WHEN I  
9 HAD DISABUSED MYSELF OF THE VARIOUS LIES AND MISREPRESENTATIONS  
10 ON WHICH SEA ORG AND THE CURRENT OPERATING METHOD OF  
11 SCIENTOLOGY IS BASED.

12 Q WERE THERE ANY OTHER TOPICS OF CONVERSATION THAT  
13 YOU ARE AWARE OF AT THIS TIME?

14 A I DON'T RECALL ANYTHING ELSE.

15 Q NOW, FROM THE DOCUMENTS YOU HAD PREVIOUSLY  
16 IDENTIFIED PRIOR TO ASSERTING YOUR FIFTH AMENDMENT PRIVILEGE  
17 THAT YOU HAD DELIVERED TO YOUR COUNSEL, DO YOU KNOW IF ANY  
18 OF THOSE DOCUMENTS HAD BEEN DELIVERED OR MADE AVAILABLE TO  
19 ANYONE AFFILIATED WITH ABC?

20 A I DON'T BELIEVE SO.

21 Q PRIOR TO YOUR INTERVIEW ONE MONTH LATER,  
22 APPROXIMATELY ONE MONTH LATER WITH ABC ON 20/20 PROGRAM, DID  
23 YOU IN ANY WAY REHEARSE YOUR TESTIMONY OR STATEMENTS?

24 A NO.

25 Q HAD YOU AT ANY TIME BEEN PROVIDED WITH A LIST OF  
26 QUESTIONS OR SUBJECT MATTER AREAS THAT WOULD BE INQUIRED  
27 INTO DURING --

28 A NO.

1 Q -- THE INTERVIEW?

2 A NO.

3 Q YOUR TESTIMONY OR STATEMENTS OR INTERVIEW, THEN,  
4 WAS ENTIRELY SPONTANEOUS; IS THAT CORRECT?

5 A THAT'S CORRECT.

6 Q HAVE THERE BEEN ANY OTHER CONTACTS WITH ANY  
7 MEMBERS OF THE MEDIA AT ANY TIME SINCE DECEMBER 12, 1981?

8 A YES.

9 MS. DRAGOJEVIC: OTHER THAN THE TWO THAT HAVE ALREADY  
10 BEEN MENTIONED?

11 MR. KOHLWECK: YES.

12 THE WITNESS: YES, THERE WERE.

13 Q BY MR. KOHLWECK: WHEN WAS THE FIRST ONE?

14 A THE FIRST ONE WAS ABOUT TWO WEEKS AFTER THE  
15 MEETING WITH MR. FREEDMAN.

16 Q WHO WAS THIS CONTACT WITH?

17 A IT WAS WITH A TELEVISION STATION IN MIAMI.

18 Q WHICH TELEVISION STATION WAS THAT?

19 A I DON'T RECALL.

20 Q AND WHO WAS THE CONTACT?

21 A JANET -- I DO NOT RECALL HER LAST NAME.

22 Q WHAT WAS HER CAPACITY WITH THE MIAMI MEDIA  
23 STATION?

24 A TO THE BEST OF MY RECOLLECTION, SHE REPRESENTED  
25 HERSELF AS A REPORTER.

26 Q WHAT WAS THE TOPIC OF CONVERSATION?

27 A PURIFICATION CENTERS.

28 Q WHAT DID YOU TELL HER ABOUT PURIFICATION CENTERS?

1           A        I SAID I HAD VERY LITTLE INFORMATION AS TO  
2 PURIFICATION CENTERS.

3           Q        HOW WAS THE CONTACT MADE?

4           A        SHE CALLED ME.

5           Q        WERE ANY OTHER TOPICS DISCUSSED WITH JANET?

6           A        THE PURIFICATION RUNDOWN ITSELF.

7           Q        DID YOU HAVE ANY KNOWLEDGE CONCERNING THE  
8 PURIFICATION RUNDOWN ITSELF?

9           A        YES.

10          Q        WHAT KNOWLEDGE IS THAT?

11          A        I TOLD HER THAT I HAD SEEN A DISPATCH FROM  
12 L. RON HUBBARD IN LATE 1979 OR EARLY 1980 IN WHICH HE ORDERED  
13 THAT UNLIMITED SCIENTOLOGY FUNDS BE MADE AVAILABLE TO GET  
14 HIM A NOBEL PRIZE AS A RESULT OF THE PURIFICATION RUNDOWN.

15          Q        WHAT OTHER KNOWLEDGE DO YOU HAVE CONCERNING THE  
16 SUBJECT MATTER AREA?

17          A        THAT IS PRETTY WELL IT.

18          Q        DID YOU COMMUNICATE THIS INFORMATION TO JANET?

19          A        YES, I DID.

20          Q        DO YOU HAVE REASON TO BELIEVE THAT THE PURIFICATION  
21 RUNDOWN IS IN ANY WAY PHONY OR FRAUDULENT?

22          A        I BELIEVE IT TO BE.

23          Q        DO YOU HAVE ANY FACTS THAT YOU BASE THAT BELIEF  
24 ON?

25          A        MY PERSONAL EXPERIENCE IN DOING THE PURIFICATION  
26 RUNDOWN AND THE FACT THAT AT THE TIME CERTAIN CLAIMS WERE  
27 MADE THAT DRUGS WERE BEING REMOVED FROM THE BODY, WHICH  
28 FACT COULD NOT BE VERIFIED -- OR WAS NOT VERIFIED, TO THE BEST

1 OF MY KNOWLEDGE, WAS NEVER SUBJECTED TO SCIENTIFIC TEST.

2 Q WHAT WAS THE NEXT CONTACT THAT YOU HAD WITH A  
3 MEMBER OF THE MEDIA, OUTSIDE OF THE THREE THAT YOU HAVE NOW  
4 TESTIFIED TO?

5 A THAT WAS ALL. THAT WAS THE ONLY MEDIA PERSONNEL  
6 WHO CONTACTED ME OR WHOM I HAD CONTACTED.

7 Q ARE YOU FAMILIAR WITH A FILE CONTAINED WITHIN THE  
8 ARCHIVES CALLED "THE BLUE LIGHT NOTES"?

9 A YES.

10 Q AND, SECONDLY, A PERSON IDENTIFIED AS L-E-N-I  
11 R-I-E-F-E-N-S-T-H-L?

12 I WON'T EVEN ATTEMPT THAT PRONUNCIATION.

13 A "RIEFENSTHL," I BELIEVE.

14 Q ARE YOU FAMILIAR WITH THAT PERSON?

15 A ONLY THROUGH THAT.

16 Q AND WHAT ARE THE CONTENTS OF THAT FILE PERTAINING  
17 TO?

18 A TO THE BEST OF MY RECOLLECTION, "THE BLUE LIGHT"  
19 WAS A VERY FAMOUS, VERY EARLY FILM WHICH WAS MADE BY  
20 LENI RIEFENSTHL -- AND THAT IS MY PRONUNCIATION; IT IS NOT  
21 NECESSARILY ACCURATE -- AND WHICH MR. HUBBARD LATER DID A,  
22 WE COULD SAY, REWRITE OF THE SCREENPLAY.

23 Q DO YOU KNOW IF THAT SCRIPT OR REWRITE OF THE  
24 SCREENPLAY WAS EVER SOLD OR UTILIZED?

25 A I DON'T KNOW.

26 Q CAN YOU RECALL APPROXIMATELY WHEN YOU AND  
27 MR. GARRISON INTERVIEWED L. RON HUBBARD, JR.?

28 A I BELIEVE IT WOULD HAVE BEEN OCTOBER 1981.

1 Q CAN YOU RECALL EVER SAYING AT ANY TIME TO  
2 L. RON HUBBARD, JR., THAT YOU HAD IN YOUR POSSESSION DOCUMENTS  
3 THAT SHOWED THE CHURCH OF SCIENTOLOGY HAS TWO HUNDRED MILLION  
4 DOLLARS IN CASH IN THE BANKS AND FIFTY-THREE MILLION DOLLARS  
5 IN ONE BANK ALONE?

6 A NO.

7 Q NEVER MADE THAT STATEMENT?

8 A NO.

9 Q HAVE YOU EVER MADE THAT STATEMENT TO ANYONE?

10 A NO.

11 Q IN YOUR DUTIES AS THE ARCHIVIST, DID YOU AT ANY  
12 TIME SEE DOCUMENTS PERTAINING TO MR. HUBBARD'S MEMBERSHIP --  
13 AND BY "MR. HUBBARD," I MEAN L. RON HUBBARD, JR. -- IN THE  
14 GEOLOGICAL SOCIETY?

15 A I DON'T RECALL THAT.

16 Q ARE YOU FAMILIAR WITH AN INDIVIDUAL NAMED  
17 FORD SCHWARTZ?

18 A ONLY BY NAME.

19 Q WHAT DO YOU KNOW ABOUT MR. SCHWARTZ?

20 A I WAS TOLD BY A GUARDIAN'S OFFICE PERSON THAT  
21 FORD SCHWARTZ WAS A DOUBLE AGENT FOR THE ORGANIZATION.

22 Q DO YOU KNOW WHY ANY INFORMATION PERTAINING TO  
23 MR. FORD SCHWARTZ HAS BEEN REQUESTED IN THIS LITIGATION  
24 THROUGH YOUR COUNSEL?

25 A NO.

26 Q HAVE YOU AT ANY TIME, TO THE BEST OF YOUR KNOWLEDGE,  
27 INFORMATION OR BELIEF, BEEN IN CONTACT WITH MR. FORD  
28 SCHWARTZ?

1 A NO.

2 Q DO YOU CLAIM THAT MR. SCHWARTZ IN ANY WAY HAS  
3 BEEN INJURIOUS TO YOU?

4 A DO I?

5 Q YES.

6 A NO.

7 Q HAVE YOU AT ANY TIME EVER BEEN INJURIOUS TO A  
8 MEMBER OR FORMER MEMBER OF THE CHURCH OF SCIENTOLOGY? AND  
9 BY "INJURIOUS," I MEAN CAUSING EMOTIONAL DISTRESS OR PHYSICAL  
10 INJURY.

11 MS. DRAGOJEVIC: I AM GOING TO OBJECT TO THAT. I DON'T  
12 SEE WHAT THE RELEVANCE OF THAT QUESTION IS. IF YOU CAN  
13 POINT OUT THE RELEVANCE OF IT, I MAY LET HIM ANSWER.

14 MR. KOHLWECK: I CERTAINLY CAN, COUNSEL. IT'S BEEN  
15 CLAIMED THAT MR. ARMSTRONG HAS BEEN SUBJECTED TO HARASSMENT  
16 AND ABUSE AT THE HANDS OF THE GUARDIAN'S OFFICE AND OTHER  
17 MEMBERS OF THE CHURCH OF SCIENTOLOGY. I INTEND, IF THERE  
18 IS ANY CROSS ACTION IN THIS MATTER, TO PURSUE A LINE OF  
19 QUESTIONING HERE WHICH WILL DEVELOP AN ISSUE OF UNCLEAN HANDS,  
20 THE FACT THAT HE HAS PARTICIPATED IN SIMILAR ACTIVITY  
21 HIMSELF.

22 MS. DRAGOJEVIC: THERE IS NO CROSS ACTION HERE. I AM  
23 GOING TO INSTRUCT HIM NOT TO ANSWER, BECAUSE I THINK THE  
24 QUESTION IS IRRELEVANT IN THE CONTEXT OF THE LAWSUIT  
25 PRESENTLY FILED.

26 MR. KOHLWECK: LET'S TAKE ANOTHER FIVE-MINUTE BREAK,  
27 AND THEN I WILL FINISH UP.

28 MS. DRAGOJEVIC: OKAY.

1 (BRIEF RECESS.)

2 MS. DRAGOJEVIC: BEFORE YOU ASK ANY QUESTIONS, I WOULD  
3 JUST LIKE TO MAKE A SHORT STATEMENT.

4 MR. KOHLWECK: SURE.

5 MS. DRAGOJEVIC: WE HAVE JUST COME BACK FROM A BREAK.

6 AT THIS TIME I WOULD LIKE TO INDICATE THAT I  
7 WILL WITHDRAW ANY OBJECTIONS THAT I MADE, WHICH I BELIEVE  
8 WERE APPROXIMATELY THREE OBJECTIONS, BASED UPON THE FIFTH  
9 AMENDMENT PRIVILEGE. I HAVE RECONSIDERED THOSE OBJECTIONS  
10 AND WILL WITHDRAW THEM IN THAT IT IS OUR CONTENTION THAT  
11 MR. ARMSTRONG IS RIGHTFULLY IN POSSESSION OF THOSE DOCUMENTS  
12 AND THAT ANY CRIMINAL COMPLAINT OR ACTION THAT MAY OR MAY  
13 NOT BE FILED AGAINST HIM WOULD BE TOTALLY FRIVOLOUS AND  
14 WOULD ALSO BE THE SUBJECT OR COULD BE THE SUBJECT OF A  
15 MALICIOUS PROSECUTION ACTION. SO I WITHDRAW MY OBJECTIONS  
16 AND I INVITE COUNSEL TO REASK THE QUESTIONS, IF HE SO DESIRES,  
17 DURING THE REMAINDER OF THE DEPOSITION.

18 MR. KOHLWECK: COUNSEL, SINCE I DIDN'T TAKE NOTES ON  
19 THAT, CAN YOU RECALL WHERE YOU ASSERTED THE PRIVILEGE SO I  
20 CAN RECONSTRUCT THE QUESTIONS?

21 MS. DRAGOJEVIC: YES. I BELIEVE I FIRST ASSERTED THE  
22 PRIVILEGE JUST AFTER THE LUNCH BREAK. IT WOULD HAVE BEEN  
23 PROBABLY DURING THE FIRST HALF HOUR FOLLOWING THE LUNCH  
24 BREAK. I CANNOT RECALL THE EXACT QUESTIONS NOW.

25 MR. KOHLWECK: ANOTHER WAY WE CAN DO THIS, WE CAN LEAVE  
26 BLANKS IN THE DEPOSITION TRANSCRIPT, AND MR. ARMSTRONG CAN  
27 PROVIDE THE ANSWERS HE OTHERWISE WOULD HAVE GIVEN. HOWEVER,  
28 THAT WILL DENY ME THE OPPORTUNITY TO FOLLOW UP ON A CHAIN

1 OF QUESTIONS EMANATING FROM THOSE ANSWERS.

2 WOULD YOU BE WILLING, IN EXPEDITING THIS  
3 PROCEEDING, AT A LATER TIME TO ALLOW ME TO TAKE HIS  
4 DEPOSITION IN ORDER TO GO FOR THE FRUITS OF THOSE ANSWERS?

5 MS. DRAGOJEVIC: I WOULD PREFER -- AND SINCE WE STILL  
6 HAVE SOME TIME HERE -- THAT WE SEARCH THE RECORD FOR  
7 THOSE QUESTIONS. I DON'T THINK THAT WOULD BE TOO DIFFICULT,  
8 BECAUSE I THINK THEY WERE ALL CLOSE IN TIME. AND PERHAPS  
9 YOU CAN ASK THOSE SAME QUESTIONS NOW, AND THEN WE WON'T  
10 HAVE TO COME BACK FOR THREE ANSWERS.

11 MR. KOHLWECK: ALL RIGHT. LET'S SEE IF I CAN  
12 RECONSTRUCT THE QUESTIONS IN A COUPLE MINUTES.

13 Q MR. ARMSTRONG, I THINK WE HAVE ESTABLISHED THAT  
14 YOU PERSONALLY ACCOMPANIED MR. OMAR GARRISON TO CARSON CITY  
15 AROUND THE 4TH OF NOVEMBER, 1981, IN ORDER TO INTERVIEW  
16 L. RON HUBBARD, JR.; IS THAT CORRECT?

17 A YES.

18 Q I SHOW YOU A XEROX COPY OF CERTAIN RECEIPTS THAT  
19 WERE TURNED IN, I BELIEVE, BY YOURSELF AS PART OF YOUR  
20 EXPENSE REPORT ON THAT TRIP.

21 A YES.

22 Q DO YOU RECOGNIZE THOSE AS TWO COPIES OF RECEIPTS  
23 THAT YOU DID TURN IN?

24 A I COULDN'T ATTEST TO THAT. THEY MAY BE.

25 MS. DRAGOJEVIC: GERRY, IF YOU ARE NOT SURE, IT IS BEST  
26 TO SAY THAT YOU DON'T KNOW.

27 THE WITNESS: I DON'T KNOW.

28 Q BY MR. KOHLWECK: DO YOU RECALL IF YOU STAYED AT



1 THE CITY CENTER MOTEL ON THAT TRIP?

2 A YES.

3 Q DO YOU RECALL IF MR. R. H. CALVERT, C-A-L-V-E-R-T,  
4 ACCOMPANIED YOU ON THAT TRIP?

5 A NO.

6 Q DO YOU KNOW WHO MR. R. H. CALVERT IS?

7 A THAT WAS A NAME I USED AT THE TIME.

8 Q WHY DID YOU USE THAT NAME?

9 A IT IS A RATHER STANDARD PRACTICE WITHIN  
10 SCIENTOLOGY TO USE WITHIN THE SEA ORG OR THE GUARDIAN'S  
11 OFFICE PHONY NAMES LIKE THAT ON OCCASION WHEN ONE IS INVOLVED  
12 IN THAT KIND OF ACTIVITY. AT THAT TIME L. RON HUBBARD, JR.,  
13 STATED TO MR. GARRISON THAT HE WOULD NOT SPEAK TO ANYONE  
14 FROM THE CHURCH -- OR I SHOULD REPHRASE THAT. THAT HE DID  
15 NOT WANT TO SPEAK TO ANYONE. SO FOR THAT REASON I  
16 REPRESENTED MYSELF AS MR. CALVERT. AT THAT TIME RON DE WOLFE --  
17 L. RON HUBBARD, JR. -- WAS REPRESENTED TO ME BY VARIOUS  
18 INDIVIDUALS WITHIN THE ORGANIZATION AS OPPRESSIVE, PSYCHOTIC,  
19 AND VARIOUS OTHER THINGS LIKE THAT. AND I DID THIS AS A  
20 STANDARD OPERATING PRACTICE OF SEA ORG.

21 Q IF YOU KNOW, IS THE NAME R. H. CALVERT THE NAME  
22 OF A REAL INDIVIDUAL?

23 A I DON'T BELIEVE SO.

24 Q ISN'T IT A FACT THAT HE WAS FORMERLY THE  
25 EXECUTIVE DIRECTOR OF RALSTON-PILOT DURING THE 1970'S?

26 MS. DRAGOJEVIC: IF YOU KNOW.

27 THE WITNESS: I DON'T KNOW.

28 Q BY MR. KOHLWECK: DID YOU FILL OUT THE GUEST

1 RECEIPT AT THE HOTEL, IF YOU CAN RECALL?

2 A I DON'T RECALL.

3 Q BY LOOKING AT THIS, CAN YOU TELL IF THIS APPEARS  
4 TO BE YOUR HANDWRITING AND/OR PRINTING?

5 A YES.

6 Q ACROSS THAT RECEIPT READS THE ADDRESS 6430 SUNSET  
7 BOULEVARD.

8 DO YOU KNOW IF THAT IS A REAL ADDRESS?

9 A I DON'T KNOW.

10 Q DO YOU KNOW WHY YOU CHOSE THAT ADDRESS?

11 A IT WAS EITHER THE REAL ADDRESS OR AN APPROXIMATE  
12 ADDRESS PERTAINING TO AN OFFICE IN WHICH THERE WAS A P.R.  
13 INDIVIDUAL WHO OCCASIONALLY REPRESENTED OMAR GARRISON. THE  
14 PURPOSE OF THAT WAS TO DECEIVE L. RON HUBBARD, JR., SHOULD  
15 HE CHECK UP ON US. AND THAT WAS THE SOLE PURPOSE OF THAT.

16 Q DURING THE TIME THAT YOU WERE THE ARCHIVIST,  
17 DID YOU USE ALIASES ON ANY OTHER TRIP?

18 A I DO NOT BELIEVE SO.

19 Q HAVE YOU AT ANY OTHER TIME WHATSOEVER WHILE  
20 INVOLVED WITH SCIENTOLOGY USED ALIASES?

21 A MANY TIMES.

22 Q DURING THE TIME YOU WERE AN ARCHIVIST, DO I HAVE  
23 A CORRECT UNDERSTANDING THIS OCCURRED JUST ONCE, ON THE  
24 OCCASION WHEN YOU WERE VISITING MR. HUBBARD, JR.?

25 A NO. WHAT YOU EARLIER ASKED WAS "ON TRIPS."  
26 HOWEVER, TO MY RECOLLECTION, I DID USE AN ALIAS WHEN I FIRST  
27 ARRIVED IN LOS ANGELES.

28 Q WHERE DID YOU ARRIVE FROM?

1 A GILMAN HOT SPRINGS.

2 Q WHERE DID YOU USE THE ALIAS?

3 A I USED ALIASES IN LA QUINTA; I USED ALIASES IN  
4 GILMAN HOT SPRINGS; AND I USED AN ALIAS IN LOS ANGELES.  
5 ALL OF THESE THINGS WERE ORDERED BY THE ORGANIZATION.

6 Q PERHAPS I CONFUSED YOU.

7 WHEN ARRIVING IN LOS ANGELES, WHAT WERE THE  
8 CIRCUMSTANCES OF YOUR USING AN ALIAS?

9 A AT THE TIME OF MY ARRIVAL IN LOS ANGELES, THE  
10 COMMODORE'S MESSENGER ORG SENIORS HAD AT THE SAME TIME  
11 LEFT GILMAN HOT SPRINGS BECAUSE THERE WAS THE THREAT OF AN  
12 F.B.I. RAID OR OTHER GOVERNMENT AGENCY'S RAID OF THAT  
13 PROPERTY. SO THE FACT OF THEIR EXISTENCE AND THE FACT THAT  
14 C.M.O. WERE IN FACT CONTROLLING ALL SCIENTOLOGY ORGANIZATIONS  
15 AT THAT TIME FROM GILMAN HOT SPRINGS WAS TO BE KEPT A  
16 SECRET. FURTHERMORE, THAT THEY SHIFTED CONTROL TO LOS ANGELES  
17 WAS AT THAT TIME TO BE KEPT A SECRET, AS AT THAT TIME IT WAS  
18 ASSUMED THAT I WOULD BE GOING BACK TO GILMAN HOT SPRINGS  
19 VERY SHORTLY ONCE THE THREAT OF A RAID WAS OVER. SO I  
20 OCCASIONALLY USED AN ALIAS.

21 Q WHAT PERIOD OF TIME ARE WE TALKING ABOUT,  
22 MR. ARMSTRONG?

23 A WE ARE TALKING ABOUT THE BEGINNING OF 1980.

24 Q DID THE C.M.O. AT THAT POINT IN TIME CONTROL THE  
25 OPERATIONS OF THE GUARDIAN'S OFFICE, TO THE BEST OF YOUR  
26 INFORMATION OR BELIEF?

27 A I DON'T BELIEVE SO.

28 Q SO YOUR PREVIOUS STATEMENT THAT THE C.M.O. WAS IN

1 CONTROL OF ALL SCIENTOLOGY ORGANIZATIONS WAS IN ERROR, WASN'T  
2 IT?

3 A SCIENTOLOGY ORGANIZATIONS AS ORGANIZATIONS. IN  
4 OTHER WORDS, BOSTON, MIAMI -- THE C.M.O. CONTROLLED ALL  
5 MANAGEMENT OPERATIONS AND, I ALSO BELIEVE, HAD MAJOR CONTROL  
6 OF THE GUARDIAN'S OFFICE AT THAT TIME, IN THAT THEY WERE AT  
7 THAT TIME ORDERING THE FINANCIAL DIRECTOR, HERBIE PARKHOUSE,  
8 AND HAD A VERY MAJOR CONTROL RIGHT INTO THE OFFICE OF THE  
9 CONTROLLER. SO IF THEY DIDN'T HAVE CONTROL OF THAT  
10 ORGANIZATION, IN THAT THEY DIDN'T HAVE CONTROL OF THE FINITE  
11 DETAILS, AT LEAST THEY HAD A GREAT DEAL OF INPUT AT THE  
12 TOPMOST SENIOR LEVEL.

13 Q WERE YOU A MEMBER OF THE GUARDIAN'S OFFICE AT  
14 THAT POINT IN TIME, MR. ARMSTRONG?

15 A NO, I WASN'T.

16 Q WERE YOU A MEMBER OF THE C.M.O. AT THAT POINT  
17 IN TIME?

18 A NO, I WASN'T.

19 Q THEN, HOW DO YOU KNOW ALL THESE THINGS TO BE  
20 FACTUALLY TRUE?

21 A I WAS ASSIGNED TO A MISSION WHICH WAS THE  
22 M.C.C.S. LEGAL MISSION AT THAT TIME. I WAS IN SUFFICIENT  
23 COMMUNICATION WITH THESE INDIVIDUALS. I OBSERVED MEETINGS  
24 AT THAT TIME BETWEEN THE TWO UNITS -- BETWEEN THE C.M.O. AND  
25 BETWEEN THE OFFICE OF THE CONTROLLER. I WAS AT A MINIMUM --  
26 I HEARD CONVERSATIONS AND I WAS ABLE TO FORM THAT CONCLUSION  
27 MYSELF FROM WHAT I OBSERVED.

28 Q IN POINT OF FACT, YOU WERE SIMPLY A MESSENGER

1 AND ERRAND BOY, WERE YOU NOT, FOR THE CORPORATE SORT-OUT?

2 A AT THE BEGINNING OF THE M.C.C.S. MISSION -- THERE  
3 WERE TWO OF US ASSIGNED TO THAT MISSION, MYSELF AND LAUREL  
4 SULLIVAN. AT THAT POINT I WAS CONSIDERABLY MORE THAN A  
5 MESSENGER AND ERRAND BOY. LATER ON, AS MY ARCHIVES DUTIES  
6 DEVELOPED AND I BEGAN TO ACCUMULATE MORE AND MORE ARCHIVAL  
7 MATERIALS, MY RESPONSIBILITIES DROPPED FROM M.C.C.S. --  
8 SEVERAL OTHER PEOPLE CAME ON TO THE MISSION IN EXECUTIVE  
9 POSITIONS -- AND FROM THAT POINT FORWARD, I SIMPLY PROVIDED  
10 ASSISTANCE, AS YOU SAY, ERRAND-BOY DUTIES.

11 MR. KOHLWECK: MR. REPORTER, BEFORE WE FORGET, MIGHT  
12 WE MARK AS PLAINTIFF'S EXHIBIT 8 A DOCUMENT CONSISTING OF  
13 SEVERAL XEROX RECEIPTS, EACH IDENTIFIED AS BEING PART OF  
14 THE CARSON CITY, NEVADA AREA.

15 DO YOU HAVE ANY OBJECTION TO THAT REPRESENTATION,  
16 COUNSEL?

17 MS. DRAGOJEVIC: YOU ARE SIMPLY STATING THEY ARE FROM  
18 CARSON CITY, NEVADA?

19 MR. KOHLWECK: APPEAR TO BE.

20 MS. DRAGOJEVIC: I HAVE NO OBJECTION TO THAT.

21 MR. KOHLWECK: AND WE WILL MAKE A XEROX OF THIS, AFTER  
22 IT IS MARKED, FOR COUNSEL.

23 (THE AFOREMENTIONED CARSON CITY, NEVADA RECEIPTS  
24 WERE MARKED BY THE REPORTER AS PLAINTIFF'S EXHIBIT NO. 8  
25 FOR IDENTIFICATION AND ARE ATTACHED HERETO.)

26 MS. DRAGOJEVIC: COUNSEL, MAY I ASK HOW MUCH MORE TIME  
27 YOU ANTICIPATE?

28 MR. KOHLWECK: I HAD PLANNED ON A HALF HOUR, COUNSEL,

1 TOTAL FROM THE TIME I STARTED. BUT IF I AM GOING TO HAVE  
2 TO GO INTO THIS PRIVILEGED AREA, I AM GOING TO HAVE TO GO  
3 WHICHEVER WAY YOUR CLIENT TAKES ME WITH HIS ANSWERS. I  
4 WOULD ESTIMATE I HAVE ABOUT FIFTEEN MINUTES OF QUESTIONS THAT  
5 I HAD ORIGINALLY PLANNED TO ASK.

6 Q MR. ARMSTRONG, ISN'T IT A FACT THAT DURING  
7 DECEMBER OF 1977 THERE WAS A DISPATCH CONCERNING YOU, THAT  
8 YOU WERE APPROVED FOR DUTY AT THE S. U. OR SPECIAL UNIT,  
9 PROVIDED YOU WERE NOT EVER TO BE ON C.M.O. OR COMMODORE  
10 STAFF GUARDIAN LINES NOR AT ANY TIME ON G.O. LINES,  
11 GUARDIAN'S OFFICE LINES, OR ANY POSITION SENIOR TO MESSENGER?  
12 ARE YOU AWARE OF SUCH A DISPATCH?

13 A I AM, YES.

14 Q WAS THAT DISPATCH LATER COUNTERMANDED?

15 A YES.

16 Q BY WHOM AND WHEN?

17 A I IMAGINE THAT IT WAS COUNTERMANDED BY L. RON  
18 HUBBARD HIMSELF.

19 Q WERE YOU AT ANY TIME AFTER 1977 A PART OF THE  
20 G.O.?

21 A NO.

22 Q WERE YOU AT ANY TIME SUBSEQUENT TO DECEMBER 1977  
23 PART OF THE C.M.O.?

24 A NO.

25 Q WERE YOU AT ANY TIME SUBSEQUENT TO DECEMBER 1977  
26 SENIOR TO ANY MESSENGER?

27 A NO.

28 Q SO IN EFFECT THAT DISPATCH STAYED IN EFFECT,

1 DIDN'T IT?

2 A REREAD THAT.

3 Q THAT YOU WERE APPROVED FOR THE SPECIAL UNIT  
4 PROVIDED YOU WERE NOT ON C.M.O. OR COMMODORE STAFF GUARDIAN  
5 LINES NOR ON G.O. LINES NOR SENIOR TO ANY MESSENGER.

6 POINT OF FACT, YOU NEVER DID GO ON ANY OF THOSE  
7 LINES SUBSEQUENT TO DECEMBER 1977, DID YOU?

8 A I WAS ON THOSE LINES.

9 Q WHICH LINES?

10 A I WAS ON G.O. LINES AND ON C.M.O. LINES.

11 Q WHICH POST DID YOU HOLD?

12 A ARCHIVIST.

13 Q WHICH ORGANIZATION WAS ARCHIVIST FUNCTIONALLY  
14 PART OF?

15 A PERSONNEL OFFICE OF L. RON HUBBARD.

16 Q NOW, IS THAT PART OF C.M.O.?

17 A NO.

18 Q IS IT PART OF C.S.G.?

19 A NO.

20 Q IS IT PART OF G.O.?

21 A NO.

22 Q OR IS IT SENIOR TO MESSENGERS?

23 A NO.

24 Q DO YOU KNOW AN INDIVIDUAL NAMED GEORGE KELLY?

25 A YES.

26 Q WHO IS GEORGE KELLY?

27 A GEORGE KELLY IS A PERSON WHO WAS IN -- HE COMES  
28 FROM CHILLIWACK, BRITISH COLUMBIA. HE WAS IN THE SEA ORG

1 FOR A WHILE, AND HE HAS BEEN CARRYING OUT A QUEST RECENTLY  
2 TO GET INTO THE ETHICS OF L. RON HUBBARD.

3 Q WHEN WAS THE LAST TIME YOU HAD ANY COMMUNICATION  
4 WITH MR. KELLY?

5 A I WOULD SAY A MONTH AGO.

6 Q WHAT WERE THE CIRCUMSTANCES OF THAT COMMUNICATION?

7 A GEORGE AND I MET IN A RESTAURANT IN COSTA MESA.

8 Q WHAT WAS THE TOPIC OF CONVERSATION?

9 A THE TOPIC OF CONVERSATION WAS GEORGE WAS TRYING  
10 TO FIGURE ON A PLAN BY WHICH HE COULD LOCATE MR. HUBBARD  
11 IN ORDER TO COMMUNICATE TO HIM WHAT HE WAS DOING TO HIMSELF  
12 AND THE ORGANIZATION BY NOT BEING HONEST ABOUT HIMSELF IN  
13 HIS REPRESENTATIONS AND HIS ACTIONS, ET CETERA.

14 MR. KOHLWECK: EXCUSE ME.

15 (BRIEF RECESS.)

16 (RECORD READ BY REPORTER.)

17 Q BY MR. KOHLWECK: DID YOU PROVIDE ANY MATERIALS  
18 TO MR. KELLY?

19 A NO.

20 Q HAVE YOU AT ANY TIME?

21 MS. DRAGOJEVIC: I WILL OBJECT TO THAT AS VAGUE AND  
22 AMBIGUOUS. WHAT MATERIALS?

23 MR. KOHLWECK: ANY MATERIALS.

24 MS. DRAGOJEVIC: ANY MATERIALS OF ANY KIND?

25 MR. KOHLWECK: SINCE THE TWO OF THEM JOINED  
26 SCIENTOLOGY.

27 IF YOU CAN RECALL.

28 A I DON'T BELIEVE SO. WE HAVE CORRESPONDED; NO



1 MATERIALS, I BELIEVE.

2 Q DID YOU TELL MR. KELLY THAT YOU WERE ENGAGED OR  
3 WERE OR HAD BEEN ENGAGED IN A PROJECT WRITING THE BIOGRAPY  
4 OF L. RON HUBBARD?

5 A NO.

6 Q DID YOU TELL MR. KELLY THAT YOU, YOURSELF, WERE  
7 ENGAGED IN WRITING A SCIENCE FICTION BASED LOOSELY ON  
8 SCIENTOLOGY AND MR. HUBBARD?

9 A NO.

10 Q DID MR. KELLY TELL YOU THAT HE WAS WRITING ANY  
11 BOOKS AT THAT TIME?

12 A I DON'T BELIEVE SO.

13 Q DO YOU KNOW IF MR. KELLY HAS BEEN DECLARED A  
14 SUPPRESSIVE PERSON?

15 A DO I KNOW IF HE HAS?

16 Q YES.

17 A I RECALL HIM SAYING THAT HE WAS. I DON'T BELIEVE  
18 I'VE EVER SEEN THE DOCUMENT.

19 Q AS PART OF YOUR OFFICE MANAGEMENT SYSTEM WHEN  
20 YOU WERE THE ARCHIVIST, DID YOU FOLLOW THE PRACTICE OF  
21 HAVING CHECK-OUT CARDS FOR ANY FILES THAT WERE WITHDRAWN  
22 FROM THE ARCHIVES?

23 A NO.

24 Q IS THAT A STANDARD PRACTICE IN A SCIENTOLOGY  
25 ORGANIZATION, TO USE SOME SORT OF CHECK-OUT SYSTEM?

26 A I DON'T KNOW.

27 Q DID YOU KEEP ANY SORT OF INVENTORY OR RECORD  
28 WHATSOEVER OF MATERIALS THAT YOU HAD PROVIDED TO OMAR GARRISON?

1 A NO.

2 Q IS THERE ANY WAY OF RECONSTRUCTING WHAT ORIGINAL  
3 MATERIALS MAY HAVE BEEN PROVIDED TO MR. GARRISON?

4 MS. DRAGOJEVIC: DO YOU MEAN ORIGINALS OR COPIES?

5 MR. KOHLWECK: ORIGINALS PROVIDED BY MR. ARMSTRONG.

6 THE WITNESS: YES.

7 Q BY MR. KOHLWECK: AND HOW WOULD THAT BE POSSIBLE?

8 A BY ME GOING THROUGH ALL THOSE MATERIALS.

9 Q APPROXIMATELY HOW MUCH MATERIAL IS CONTAINED IN  
10 THE ARCHIVES PROJECT?

11 A PERHAPS 100 LINEAR FEET.

12 Q ISN'T IT A FACT THERE ARE APPROXIMATELY TEN  
13 LEGAL SIZE FOUR-DRAWER CABINETS PLUS ANOTHER TWENTY CRATES,  
14 APPROXIMATELY, OF MATERIALS THAT HAVE NOT BEEN FILED?

15 A RUN THAT BY ME AGAIN.

16 Q TEN LEGAL FOUR-DRAWER FILE CABINETS THAT ARE  
17 COMPLETELY FULL PLUS ANOTHER TWENTY CRATES OF OTHER  
18 DOCUMENTS THAT HAVE YET TO BE INTEGRATED INTO THE OTHER FILES;  
19 IS THAT A GOOD APPROXIMATION OF THE CONTENTS OF THE  
20 ARCHIVES?

21 A WHEN YOU SAY "FILE CABINETS," YOU MEAN THOSE  
22 MATERIALS WHICH ARE ALREADY IN THE FILE CABINETS?

23 Q THAT IS WHAT I AM TALKING ABOUT, PLUS ANOTHER  
24 TWENTY CRATES THAT HAVE NOT YET BEEN FILED.

25 A THERE ARE SOME CARDBOARD BOXES. IS THAT WHAT  
26 YOU MEAN?

27 Q THAT WILL DO FOR A DEFINITION.

28 A I BELIEVE THAT'S ABOUT ACCURATE.

1 Q IS IT YOUR TESTIMONY THAT BY REVIEWING THE  
2 CONTENTS OF THESE APPROXIMATELY TEN CABINETS AND TEN TO  
3 TWENTY CARDBOARD BOXES, FROM MEMORY YOU COULD RECONSTRUCT  
4 WHAT MATERIALS HAVE BEEN PROVIDED TO MR. GARRISON?

5 A I DIDN'T SAY THAT.

6 Q YOU SAID THAT YOU COULD RECONSTRUCT THE MATERIALS  
7 THAT HAVE BEEN PROVIDED BY YOU PERSONALLY INSPECTING  
8 MATERIALS CONTAINED WITHIN THE ARCHIVES; IS THAT CORRECT?

9 MS. DRAGOJEVIC: I OBJECT TO THAT. THAT IS A  
10 MISSTATEMENT OF HIS TESTIMONY. HE INDICATED THAT HE COULD  
11 GO THROUGH ORIGINAL DOCUMENTS GIVEN TO MR. GARRISON TO  
12 DETERMINE WHAT THEY ARE. HE NEVER STATED THAT HE COULD GO  
13 THROUGH THE ARCHIVES MATERIALS AND RECONSTRUCT FROM MEMORY  
14 EVERYTHING HE GAVE TO OMAR GARRISON.

15 MR. KOHLWECK: RATHER THAN BATTLE THAT OUT, I WILL  
16 REPHRASE IT.

17 Q CAN YOU RECONSTRUCT WHAT MATERIALS HAVE BEEN  
18 GIVEN TO MR. GARRISON, ORIGINAL MATERIALS?

19 A YES.

20 Q AND BY WHAT PROCESS WOULD YOU DO THAT?

21 A BY GOING THROUGH THOSE MATERIALS.

22 Q WHAT MATERIALS?

23 A THE ORIGINAL MATERIALS THAT WERE PROVIDED TO  
24 MR. GARRISON.

25 Q WELL, WHAT IF MR. GARRISON WOULD NOT COOPERATE?  
26 IS THERE ANY WAY TO RECONSTRUCT WHAT MATERIALS WERE PROVIDED  
27 TO HIM?

28 A THAT'S A -- I DON'T UNDERSTAND THE QUESTION OR

1 IT IS A SILLY QUESTION. I'M NOT SURE.

2 Q I WILL TRY NOT TO ASK YOU SILLY QUESTIONS,  
3 BELIEVE ME.

4 AS TO THE MATERIALS THAT HAVE BEEN PROVIDED TO  
5 OMAR GARRISON, ORIGINAL MATERIALS, IS THERE ANY METHOD --  
6 EXCEPTING MR. GARRISON'S COOPERATION -- OF RECONSTRUCTING  
7 WHAT MATERIALS NO LONGER EXIST IN THE ARCHIVES?

8 A I BELIEVE SO, YES.

9 Q WHAT METHOD IS THAT?

10 A THAT IS BY CROSS CHECK OF TOM VORM'S VARIOUS  
11 INVENTORIES.

12 Q AGAIN, THE FILE CONTENTS?

13 A YES.

14 Q NOW, TOM VORM'S INDEX, DOES THAT SPECIFICALLY  
15 IDENTIFY ORIGINAL MATERIALS?

16 A YES.

17 Q WHEN YOU LEFT YOUR POST ON OR ABOUT DECEMBER 12,  
18 1981, DID YOU AT THAT TIME HAVE ANY MATERIALS THAT HAD BEEN  
19 HOUSED IN THE ARCHIVES PROJECT IN YOUR POSSESSION OR UNDER  
20 YOUR CONTROL?

21 A YES.

22 Q WHAT MATERIALS WERE THOSE?

23 A THOSE WERE THE -- THERE WERE SOME ORIGINALS AND  
24 THERE WAS A NUMBER OF BINDERS CONTAINING COPIES OF DOCUMENTS  
25 WHICH I HAD PREPARED FOR MR. GARRISON.

26 Q WHAT WERE THE ORIGINAL DOCUMENTS?

27 A THE ORIGINAL DOCUMENTS WERE SOME OF THOSE WHICH  
28 HAD COME FROM THE L.R.H. ARCHIVES, WHICH MR. VORM HAS AN

1 INDEX TO.

2 Q ARE YOU SAYING I COULD ASK MR. VORM AND HE COULD  
3 TELL ME ALL MATERIALS THAT WERE IN YOUR POSSESSION OR  
4 CONTROL THAT WERE ORIGINALS WHEN YOU LEFT THE CHURCH ON OR  
5 ABOUT DECEMBER 12, 1981?

6 A I BELIEVE SO.

7 Q NOW, LET'S TEST YOUR RECOLLECTION.  
8 WHAT WERE THOSE MATERIALS?

9 A THOSE WERE MATERIALS FROM THE HUBBARD  
10 EXPLORATIONAL COMPANY, AND THEY WERE MATERIALS FROM  
11 SAINT HILL.

12 Q WHAT MATERIALS FROM SAINT HILL?

13 A REFERRING TO THE PURCHASE.

14 Q AND WHEN YOU SAY "REFERRING TO THE PURCHASE,"  
15 DOES THAT INCLUDE THE SOURCE OF FUNDING FOR THE PURCHASE?

16 A I DON'T RECALL THAT. IT MAY HAVE BEEN INCLUDED,  
17 BUT I DO NOT RECALL IT.

18 Q WHAT OTHER ORIGINAL MATERIALS?

19 A MATERIALS REFERRING TO PUBLIC RELATIONS  
20 ACTIVITIES AT SAINT HILL, MATERIALS HAVING TO DO WITH  
21 HORTICULTURAL EXPERIMENTS.

22 Q BY MR. HUBBARD?

23 A YES.

24 Q WHILE HE WAS AT SAINT HILL?

25 A YES.

26 Q CONCERNING THE BREEDING AND RAISING OF A SPECIAL  
27 STRAIN OF TOMATOES?

28 A I DON'T BELIEVE SO, BUT I DO NOT KNOW FOR SURE.

1 Q WHAT OTHER MATERIALS?

2 A THAT IS WHAT I RECALL.

3 Q APPROXIMATELY HOW MANY PAGES WOULD YOU ESTIMATE  
4 THESE DOCUMENTS TO BE?

5 A THREE THOUSAND.

6 Q THREE THOUSAND?

7 A UH-HUH.

8 Q DID YOU ALSO AT THAT TIME HAVE POSSESSION OR  
9 CONTROL OF THAT CORRESPONDENCE WE PREVIOUSLY TALKED ABOUT  
10 AUTHORED BY MARY SUE HUBBARD?

11 A NO.

12 Q I AM TALKING ABOUT THE LETTER THAT WAS SO  
13 SENSITIVE YOU DIDN'T WANT TO DISCUSS ITS CONTENTS, THE ONE  
14 YOU TOOK TO CLEARWATER WITH YOU.

15 A YES.

16 Q DOES "YES" MEAN YOU ARE ACKNOWLEDGING MY STATEMENT;  
17 OR "YES," YOU HAD IT IN YOUR POSSESSION?

18 A YES, I HAD IT.

19 Q WERE THERE ANY OTHER DOCUMENTS LIKE THAT?

20 A NO.

21 Q HOW ABOUT THE EXCHANGE OF CORRESPONDENCE BETWEEN  
22 L. RON HUBBARD AND HIS OTHER TWO WIVES?

23 A NO. ALL THAT MATERIAL IS IN ARCHIVES.

24 Q THUS FAR, IF I UNDERSTAND YOU, WE ARE TALKING  
25 ABOUT ORIGINAL DOCUMENTS YOU HAD IN YOUR POSSESSION?

26 A YES.

27 Q WHAT COPIES OF DOCUMENTS DID YOU HAVE IN YOUR  
28 POSSESSION OR CONTROL ON OR ABOUT DECEMBER 12, 1981?

1           A           I DON'T RECALL. THEY WERE THE FINAL COPIES  
2 WHICH I MADE FOR OMAR GARRISON PRIOR TO MY LEAVING.

3           Q           CAN YOU ESTIMATE THE NUMBER OF PAGES INVOLVED IN  
4 THOSE COPIES?

5           A           A THOUSAND.

6           Q           I WILL NOW REPRESENT TO YOU THAT I HAVE REVIEWED  
7 PERSONALLY EVERY RECEIPT FOR PURCHASE THAT YOU MADE DURING  
8 THE YEAR 1981. DURING 1981, BETWEEN JANUARY 1ST AND  
9 DECEMBER 1ST, YOU PURCHASED TWO CRATES OF XEROX PAPER, WHICH  
10 IS APPROXIMATELY 20,000 SHEETS. ON OR ABOUT DECEMBER 1ST,  
11 1981, YOU PURCHASED THREE ADDITIONAL CRATES OF XEROX PAPER,  
12 WHICH WAS COMPLETELY EXPENDED IN A NINE-DAY PERIOD OF TIME.  
13 BY MY ESTIMATE, THAT WOULD HAVE BEEN APPROXIMATELY 30,000  
14 SHEETS OF PAPER.

15                       WHAT WERE YOU XEROXING WITH THOSE SHEETS OF  
16 PAPER?

17           MS. DRAGOJEVIC: I AM GOING TO OBJECT TO THAT QUESTION  
18 AS ASSUMING A LOT OF FACTS NOT IN EVIDENCE. YOU HAVEN'T  
19 QUESTIONED THE WITNESS ABOUT ANY OF THAT. WHETHER THOSE  
20 REPRESENTATIONS ARE TRUE OR NOT, I DON'T KNOW.

21           MR. KOHLWECK: ALL RIGHT. WE WILL BREAK IT DOWN BY  
22 ELEMENT AND CONSUME SOME TIME. I WAS TRYING TO SAVE SOME  
23 TIME.

24           Q           MR. ARMSTRONG, DO YOU HAVE ANY RECOLLECTION OF  
25 PURCHASING PAPER AND PAPER SUPPLIES IN 1981?

26           A           YES.

27           Q           ON WHAT OCCASION DID YOU PURCHASE THAT PAPER, IF  
28 YOU RECALL?

1 A MANY OCCASIONS.

2 Q HOW MANY?

3 A I WOULD SAY TEN TIMES.

4 Q APPROXIMATELY HOW MUCH PAPER DID YOU PURCHASE  
5 FOR XEROGRAPHIC PURPOSES?

6 A I WOULD SAY A CASE AT A TIME.

7 Q WELL, HOW MANY CASES, THEN?

8 A PROBABLY TEN CASES.

9 Q CAN YOU RECALL PURCHASING THREE CASES OF  
10 XEROGRAPHY PAPER ON OR ABOUT DECEMBER 1ST, 1981?

11 A NOT SPECIFICALLY, BUT IT IS POSSIBLE.

12 Q CAN YOU RECALL ALMOST CONTINUOUSLY OPERATING A  
13 MINOLTA COPIER BETWEEN DECEMBER 1ST AND DECEMBER 12, 1981?

14 A YES.

15 Q APPROXIMATELY HOW MANY HOURS A DAY DID YOU  
16 OPERATE THE COPIER IN THAT TWELVE-DAY PERIOD OF TIME?

17 A I WOULD SAY IT WAS IN OPERATION PROBABLY -- IT IS  
18 VERY DIFFICULT TO SAY. IT WAS PROBABLY FOUR HOURS A DAY.

19 Q SOME DAYS AS MANY AS NINE OR TEN HOURS, POSSIBLY?

20 A VERY UNLIKELY. IT MAY HAVE BEEN OPERATED DURING  
21 THAT TIME, BUT ACTUALLY RUNNING COPIES, NO. THERE IS TIME  
22 EXPENDED COLLATING, SETTING UP THE MACHINE, AND SO FORTH.

23 Q CAN YOU RECALL UTILIZING MORE THAN ONE CRATE  
24 OF XEROGRAPHY PAPER DURING THAT PERIOD OF TIME?

25 A I DON'T RECALL, BUT IT IS VERY LIKELY.

26 Q IS IT VERY LIKELY YOU USED MORE THAN TWO CRATES  
27 OF PAPER DURING THAT PERIOD OF TIME?

28 A A CASE OF PAPER IS 5,000 PAGES. I WOULD SAY



1 DURING MY FINAL TWO WEEKS I MAY HAVE MADE 5,000 COPIES, I  
2 MAY HAVE MADE 10,000 COPIES.

3 Q MIGHT YOU HAVE MADE 15,000 COPIES?

4 A I DOUBT IT.

5 Q WAS IT SPONTANEOUS ON DECEMBER 12, 1981, THAT YOU  
6 DECIDED TO LEAVE THE CHURCH OF SCIENTOLOGY?

7 A NO.

8 Q ISN'T IT A FACT THAT YOU HAD MADE YOUR DECISION  
9 SOMETIME PRIOR TO DECEMBER 1ST, 1981, TO LEAVE THE CHURCH OF  
10 SCIENTOLOGY?

11 A IT WAS MADE SOMEWHERE AROUND DECEMBER 1ST.

12 Q ISN'T IT A FACT THAT AFTER YOU HAD MADE YOUR  
13 DECISION TO LEAVE THE CHURCH OF SCIENTOLOGY YOU MADE SEVERAL,  
14 POSSIBLY AS MANY AS 10,000 COPIES OF DOCUMENTS?

15 A THAT'S TRUE.

16 Q WERE ALL OF THOSE COPIES THAT YOU MADE PROVIDED  
17 TO MR. GARRISON?

18 A YES.

19 Q EVERY ONE?

20 A NO. HALF OF THEM. THE OTHER HALF REMAINED IN  
21 ARCHIVES OR THE OTHER HALF REMAINED AS A REPRESENTATION OF  
22 WHAT HAD BEEN COPIED FOR MR. GARRISON. SO IF IN FACT I MADE  
23 10,000 COPIES, I WOULD HAVE PROVIDED 5,000 TO MR. GARRISON.

24 Q WERE THESE MATERIALS THAT MR. GARRISON HAD  
25 REQUESTED APPROXIMATELY AT THAT POINT IN TIME?

26 A HE HAD EITHER REQUESTED THEM OR I FELT OBLIGED  
27 TO DELIVER THEM TO HIM AS A PART OF MY COMMITMENT TO HIM  
28 REGARDING THE BIOGRAPHY.

1 Q NOW, COULD YOU ESTIMATE AS A PERCENTAGE OF THAT  
2 APPROXIMATELY 5,000 SHEETS OF PAPER DELIVERED TO  
3 MR. GARRISON HOW MANY YOU FELT OBLIGED TO DELIVER TO HIM?

4 A I FELT COMMITTED TO DELIVER ALL OF THOSE TO HIM.

5 Q I MEAN, AS OPPOSED TO COPIES THAT HE HAD  
6 SPECIFICALLY REQUESTED.

7 LET ME GIVE YOU A HYPOTHETICAL SO I DON'T CONFUSE  
8 YOU.

9 WE ARE ASSUMING THERE WERE APPROXIMATELY 5,000  
10 COPIES MADE AND DELIVERED TO MR. GARRISON, SOME OF WHICH HE  
11 REQUESTED AND SOME OF WHICH YOU FELT OBLIGATED TO PROVIDE  
12 TO HIM. WHAT I WOULD LIKE TO HAVE IS YOUR ESTIMATE OF HOW  
13 MANY OF THOSE 5,000 COPIES HE REQUESTED AND HOW MANY YOU  
14 TOOK IT UPON YOURSELF TO PROVIDE TO HIM OF YOUR OWN  
15 INITIATIVE?

16 A THE MAJORITY OF DOCUMENTS, COPIES OR ORIGINALS  
17 WHICH I PROVIDED TO HIM, I PROVIDED AS MY JOB. HE DID NOT  
18 IN MANY CASES KNOW PRIOR TO MY DELIVERY OF THOSE DOCUMENTS  
19 OF THE EXISTENCE OF THEM. I DECIDED AT THAT POINT WHEN I  
20 CAME ACROSS THEM -- I HAD TO MAKE THE JUDGMENT AT THAT POINT  
21 AS TO WHETHER OR NOT THEY WERE OF BIOGRAPHICAL INTEREST.

22 MS. DRAGOJEVIC: GERRY, YOU ARE NOT ANSWERING THE  
23 QUESTION. THE QUESTION WAS BASICALLY, AS I UNDERSTOOD IT,  
24 WHAT PERCENTAGE OR AMOUNT OF THE 5,000 DOCUMENTS WERE  
25 DOCUMENTS THAT MR. GARRISON REQUESTED AND WHAT AMOUNT WERE  
26 DOCUMENTS THAT YOU PROVIDED FOR HIM WITHOUT REQUEST.

27 Q BY MR. KOHLWECK: AND I WOULD AGREE WITH COUNSEL,  
28 YOU HAVE NOT BEEN RESPONSIVE TO THAT QUESTION.

1           A       SO TO ANSWER THAT QUESTION, PROBABLY ONE-EIGHTH  
2 HE REQUESTED.

3           Q       AND OF THE REMAINING SEVEN-EIGHTHS, DID YOU  
4 FEEL IT WAS YOUR RESPONSIBILITY TO PROVIDE IT TO  
5 MR. GARRISON SO HE WOULD HAVE THE, QUOTE, TRUE FACTS,  
6 CLOSE QUOTE, AT HIS DISPOSAL ABOUT L. RON HUBBARD AND THE  
7 CHURCH OF SCIENTOLOGY?

8           A       I DON'T UNDERSTAND WHAT YOU IMPLIED BY THE  
9 QUOTES, TRUE FACTS.

10          Q       LET'S TAKE THE QUOTES OFF, THEN.

11          A       THEN, I WANTED HIM TO HAVE THE WHOLE TRUTH.

12          Q       WAS IT YOUR FEELING THAT SOMEHOW SOME OF THIS  
13 INFORMATION HAD BEEN SHELVED OR DIVERTED FROM MR. GARRISON'S  
14 ATTENTION AT THAT POINT IN TIME?

15          A       NO.

16          Q       IN PROVIDING THIS INFORMATION TO MR. GARRISON,  
17 DID YOU AT ANY POINT LET HIM KNOW THAT AT SOME LATER DATE  
18 YOU MIGHT BE REQUESTING MORE ACCESS TO THIS INFORMATION  
19 YOU WERE PROVIDING TO HIM?

20          A       NO.

21          Q       WERE THERE EVER ANY CONVERSATIONS OF THAT NATURE  
22 BETWEEN YOURSELF AND MR. GARRISON?

23          A       NO.

24          Q       WHAT CAUSED YOU ON DECEMBER 12 TO RETAIN  
25 POSSESSION OF CERTAIN OF THE ORIGINAL DOCUMENTS?

26          A       I HAD NOT AT THAT TIME BEEN ABLE TO COPY  
27 EVERYTHING WHICH WAS OF A BIOGRAPHICAL NATURE; ADDITIONALLY,  
28 I GAVE THEM TO HIM SO THAT HE COULD SELECT OUT OF THOSE

1 MATERIALS WHAT HE WISHED COPIED OR WHAT HE CONSIDERED OF  
2 BIOGRAPHICAL INTEREST. I HAD DONE THAT A NUMBER OF TIMES  
3 BECAUSE OF THE QUANTITY OF DOCUMENTATION.

4 Q WAS IT YOUR INTENT ON OR ABOUT DECEMBER 12,  
5 WHEN YOU LEFT THE CHURCH OF SCIENTOLOGY, TO KEEP WORKING ON  
6 THE BIOGRAPHY PROJECT EVEN THOUGH YOU WERE NOT A MEMBER OF  
7 THE CHURCH OF SCIENTOLOGY?

8 A NO.

9 Q WERE YOU SIMPLY WRAPPING UP YOUR ASSIGNMENT BY  
10 MAKING SURE THESE ORIGINAL DOCUMENTS WERE PROVIDED TO  
11 MR. GARRISON?

12 A I TRIED TO DO AS MUCH AS I COULD BEFORE I  
13 LEFT.

14 Q HOW LONG A PERIOD OF TIME WAS THERE BETWEEN  
15 DECEMBER 12, 1981 AND UNTIL MR. GARRISON RECEIVED ALL THESE  
16 ORIGINAL DOCUMENTS THAT YOU HAD IN YOUR POSSESSION OR  
17 CONTROL ON THAT DATE?

18 A THE SAME DAY.

19 Q YOU TOOK THEM TO HIM WHERE?

20 A COSTA MESA.

21 Q AND ALL DOCUMENTS AT THAT POINT WERE TURNED OVER  
22 TO MR. GARRISON?

23 A ALL EXCEPT THAT ONE LETTER -- NO, THAT ONE  
24 LETTER AS WELL.

25 Q WAS TURNED OVER TO MR. GARRISON?

26 A YES.

27 Q AND, TO THE BEST OF YOUR KNOWLEDGE OR  
28 RECOLLECTION, NO OTHER DOCUMENTS OR COPIES WERE RETAINED BY

1 YOU AFTER DECEMBER 12 AND THE MEETING WITH OMAR GARRISON?

2 A NO.

3 Q NONE WHATSOEVER?

4 A NO.

5 Q WHEN WAS IT YOU BEGAN RETRIEVING COPIES AND  
6 ORIGINALS FROM MR. GARRISON? WAS THAT IN APRIL OF 1982?

7 A YOU SAID "COPIES AND ORIGINALS"?

8 Q COPIES AND ORIGINALS, YES.

9 A FOR MR. GARRISON I MADE SOME COPIES OF HIS COPIES  
10 IN OR AROUND MARCH -- LATE MARCH, MAYBE EARLY APRIL.

11 Q WAS IT AT THAT TIME YOU BEGAN MAKING COPIES OR  
12 WITHHOLDING ORIGINALS FOR YOURSELF?

13 A NO.

14 Q WHEN WAS THAT?

15 A AFTER APRIL.

16 Q NOW, BESIDES MR. GARRISON, WAS THERE ANY OTHER  
17 PERSON WHATSOEVER THAT YOU HAD PROVIDED COPIES OR ORIGINAL  
18 DOCUMENTS TO ON OR AFTER DECEMBER 12, 1982?

19 A NO -- OH, THOSE ATTORNEYS THAT I MENTIONED.  
20 DID YOU SAY DECEMBER 12, 1982?

21 Q EXCUSE ME. 1981.

22 A AFTER?

23 Q YES.

24 MS. DRAGOJEVIC: JUST A SECOND. ARE YOU SAYING  
25 DECEMBER 12, 1981 TO THE PRESENT OR APRIL OR WHAT DATE?

26 MR. KOHLWECK: TO THE PRESENT, WITH THE EXCEPTION OF  
27 THE TWO GROUPS OF ATTORNEYS THAT WE HAVE PREVIOUSLY  
28 IDENTIFIED.

1 THE WITNESS: NO.

2 Q BY MR. KOHLWECK: HAVE YOU GIVEN THESE DOCUMENTS  
3 TO YOUR WIFE OR ANY MEMBER OF HER FAMILY?

4 A NO.

5 Q HAS MR. GARRISON AT ANY TIME MENTIONED TO YOU,  
6 SINCE YOU LEFT THE CHURCH OF SCIENTOLOGY, THAT HE KNEW YOU  
7 WERE NO LONGER A STAFF MEMBER OF THE CHURCH OF SCIENTOLOGY?

8 A I DON'T RECALL HIM EVER MAKING THAT STATEMENT.

9 Q DID HE EVER MENTION TO YOU THAT HE WOULD LIKE  
10 TO RETAIN YOUR SERVICES AS HIS RESEARCH ASSISTANT?

11 A HE HAS REQUESTED ME TO DO RESEARCH ON OCCASION.  
12 HE DID NOT, HOWEVER, MAKE THAT STATEMENT.

13 Q DID HE MENTION TO YOU THAT ON OR ABOUT JANUARY 20,  
14 1982, HE HAD HAD A MEETING WITH VAUGHN YOUNG?

15 A HE MAY HAVE.

16 Q DID HE MENTION --

17 MS. DRAGOJEVIC: DON'T GUESS, GERRY. IF YOU DON'T  
18 REMEMBER, YOU DON'T REMEMBER.

19 THE WITNESS: NO, I DON'T RECALL THAT.

20 Q BY MR. KOHLWECK: HAD HE TOLD YOU AT ANY TIME  
21 HE HAD A MEETING WITH VAUGHN YOUNG SINCE YOUR LEAVING THE  
22 CHURCH OF SCIENTOLOGY?

23 A YES.

24 MR. KOHLWECK: EXCUSE ME.

25 (BRIEF RECESS.)

26 Q BY MR. KOHLWECK: I BELIEVE WE LEFT OFF WITH MY  
27 ASKING YOU IF YOU HAD ANY KNOWLEDGE OF A CONVERSATION  
28 BETWEEN VAUGHN YOUNG AND OMAR GARRISON CONCERNING YOUR LEAVING

1 THE CHURCH. AT THIS POINT I WILL ASK THAT YOUR ANSWER BE  
2 READ BACK.

3 (RECORD READ BY REPORTER.)

4 THE WITNESS: RIGHT. SO THE QUESTION WAS, HAD HE TOLD  
5 ME IF HE HAD A MEETING?

6 Q BY MR. KOHLWECK: HAD HE TOLD YOU DURING THAT  
7 MEETING THE FACT THAT YOU HAD LEFT THE CHURCH HAD BEEN  
8 DISCUSSED WITH HIM?

9 A I BELIEVE SO.

10 Q CAN YOU RECALL APPROXIMATELY WHEN MR. GARRISON  
11 TOLD YOU THAT?

12 A NO.

13 Q WAS IT WITHIN THE LAST THREE MONTHS?

14 A I DON'T RECALL.

15 Q CAN YOU RECALL IF IT WAS PRIOR TO APRIL OF 1982?

16 A I DON'T RECALL.

17 Q HAS HE EVER MADE A STATEMENT SUCH AS, "GERRY, I  
18 DON'T THINK I SHOULD GIVE THESE MATERIALS TO YOU SINCE YOU  
19 ARE NO LONGER A PART OF THE CHURCH"? HAS HE STATED THAT IN  
20 SUBSTANCE OR EFFECT?

21 A NO.

22 Q HAS HE EVER QUESTIONED YOU AT ANY TIME CONCERNING  
23 THE PURPOSES FOR WHICH YOU WERE REQUESTING DOCUMENTS, COPIES  
24 OR ORIGINALS?

25 A NO.

26 Q AS TO THE MATERIALS THAT YOU RECENTLY SENT BACK  
27 TO MR. GARRISON ON MONDAY OF THIS WEEK, DID HE REQUEST THAT  
28 YOU SEND THOSE MATERIALS BACK TO HIM?

1 A NO.

2 Q DID YOU PROVIDE THE DOCUMENTS TO MR. GARRISON  
3 AND MR. FLYNN ON MONDAY OF THIS WEEK IN PREPARATION AND IN  
4 ANTICIPATION FOR THIS DEPOSITION?

5 A NO.

6 Q DO YOU REMEMBER YOUR TESTIMONY YESTERDAY  
7 CONCERNING FOUR TAPES THAT YOU HAD RECEIVED FROM BARBARA  
8 DE CELLE?

9 A YES.

10 Q NOW, I BELIEVE THAT WE ESTABLISHED THROUGH  
11 ONE OF YOUR AFFIDAVITS THAT AT LEAST ONE OF THOSE TAPES  
12 CONTAINED VERBATIM MINUTES OF A MEETING THAT TOOK PLACE  
13 SOMETIME IN THE PAST, WHICH IS THE SUBJECT MATTER OF ONE OF  
14 YOUR AFFIDAVITS.

15 WHAT OTHER MATERIALS ARE CONTAINED ON THOSE  
16 TAPES?

17 A THERE IS DISCUSSION OF -- PRINCIPALLY ABOUT FILM  
18 NEGOTIATIONS AND HOW TO RESOLVE THE 2.1 MILLION DOLLAR  
19 PAYMENT TO L. RON HUBBARD. THAT IS WHAT I RECALL.

20 Q AND THAT IS THE SUBJECT OF ONE OF YOUR AFFIDAVITS,  
21 IS IT NOT?

22 A YES.

23 Q OR POSSIBLY TWO OF YOUR AFFIDAVITS CONCERNING  
24 THE R.R.F.?

25 A YEAH. IT IS THE AFFIDAVIT WHICH YOU HAD HERE.

26 Q ARE YOU AWARE OF ANY OTHER MATERIALS BEING  
27 CONTAINED ON THOSE TAPES?

28 A I DON'T RECALL AT THIS TIME.



1 Q ARE EACH OF THOSE TAPES NOW IN THE POSSESSION  
2 OF ONE OF YOUR ATTORNEYS?

3 A YES.

4 Q IS MR. FLYNN THAT ATTORNEY? DOES HE HAVE ALL OF  
5 THE TAPES?

6 A HE HAS THE TWO TAPES.

7 Q WHAT ABOUT THE OTHER TWO TAPES? YOU STATED THERE  
8 WERE FOUR TAPES YESTERDAY.

9 MS. DRAGOJEVIC: OBJECTION; ASKED AND ANSWERED.

10 GO AHEAD.

11 THE WITNESS: SORRY?

12 MS. DRAGOJEVIC: GO AHEAD AND ANSWER IT.

13 MR. KOHLWECK: HE SAYS MR. FLYNN HAS TWO TAPES. THERE  
14 ARE ANOTHER TWO TAPES.

15 MS. DRAGOJEVIC: YES. HE ANSWERED THAT YESTERDAY, BUT  
16 HE CAN GO AHEAD AND ANSWER THAT AGAIN.

17 THE WITNESS: MR. GARRISON.

18 Q BY MR. KOHLWECK: YOU HAVE NO IDEA WHATSOEVER AS  
19 TO WHAT IS ON THOSE TWO TAPES?

20 A NO IDEA.

21 MS. DRAGOJEVIC: COUNSEL, ABOUT FORTY-FIVE MINUTES AGO  
22 YOU SAID YOU HAD FIFTEEN MINUTES' WORTH OF QUESTIONS LEFT.  
23 AM I TO ANTICIPATE ANOTHER FORTY-FIVE MINUTES OF QUESTIONING?

24 MR. KOHLWECK: NOT ON MY PART, COUNSEL. BUT IF YOU  
25 WANT TO PLAY GAMES WITH ME, REQUIRING ME TO LAY A FOUNDATION  
26 FOR A SIMPLE QUESTION, WE COULD GO QUITE A WHILE.

27 MS. DRAGOJEVIC: I AM NOT PLAYING GAMES. WHEN YOU  
28 MAKE ASSUMPTIONS ABOUT NUMEROUS FACTS AND THEN WANT MY CLIENT

1 TO ANSWER "YES" OR "NO," I CONSIDER UNFAIR.

2 MR. KOHLWECK: ALL RIGHT. YOU AND I CAN HAVE A PRIVATE  
3 DEBATE ABOUT THAT LATER.

4 Q WHO IS WARREN FRISKE?

5 A WARREN FRISKE, AS I UNDERSTAND, IS A FORMER  
6 SCIENTOLOGIST.

7 Q DOES HE HAVE ANY CONNECTION WITH YOU IN ANY  
8 MANNER WHATSOEVER?

9 A NONE THAT I KNOW OF.

10 Q WHEN YOU SAY "NONE THAT I KNOW OF," WHAT DO YOU  
11 MEAN?

12 A NONE THAT I KNOW OF.

13 Q YOU HAVE NEVER MET THE PERSON?

14 A NOT THAT I KNOW OF.

15 Q WERE MATERIALS PERTAINING TO THE M.C.C.S. MISSION  
16 OR THE LEGAL MISSION CONTAINED WITHIN THE ARCHIVES PROGRAM  
17 OR PROJECT?

18 A NOT THAT I KNOW OF.

19 Q WERE SUCH DOCUMENTS EVER WITHIN YOUR CUSTODY OR  
20 CONTROL?

21 A YES.

22 Q WHEN WAS THAT?

23 A IN THE BEGINNING OF 1980.

24 Q WITH THE EXCEPTION OF THE TAPE RECORDING THAT I  
25 HAVE PREVIOUSLY QUESTIONED YOU ABOUT, DO YOU HAVE IN YOUR  
26 POSSESSION OR UNDER YOUR CONTROL ANY DOCUMENTS THAT PERTAIN  
27 TO THE M.C.C.S. MISSION, ALSO KNOWN AS THE LEGAL MISSION?

28 A NO.

1 Q AND NO SUCH PAPERS HAVE BEEN PROVIDED TO YOUR  
2 ATTORNEYS?

3 A NO, NOT BY ME OR NOT THAT I KNOW OF.

4 Q DO YOU KNOW WHO OR WHAT AOSH DK PUBLICATIONS  
5 IS?

6 A I BELIEVE SO.

7 Q WHAT IS THAT?

8 A THAT IS A PUBLICATION -- IT IS A DENMARK  
9 PUBLISHING COMPANY OR ORGANIZATION WHO PUBLISH MR. HUBBARD'S  
10 WORKS. THEY HAVE OR HAD A CONTRACT WITH OMAR GARRISON TO  
11 PUBLISH THE BIOGRAPHY.

12 Q ARE YOU FAMILIAR WITH A CERTAIN COMMITTEE OF  
13 EVIDENCE OF GUARDIAN OFFICE MEMBERS PURSUANT TO FLAG CONDITION  
14 ORDER 6439 WHICH OCCURRED ON OR ABOUT OCTOBER 8TH, 1981?

15 A I'M FAMILIAR WITH IT.

16 Q WHAT DOES THAT CONCERN?

17 A THAT CONCERNS A COMMITTEE OF EVIDENCE OF THOSE  
18 TOP GUARDIAN PEOPLE.

19 Q WHICH TOP GUARDIAN PEOPLE ARE WE TALKING ABOUT?

20 A THOSE THAT I RECALL. AGAIN, I DON'T HAVE THE  
21 DOCUMENT HERE, SO I DON'T KNOW IF THAT NUMBER IS ACCURATE,  
22 BUT IT WAS A COMMITTEE OF EVIDENCE OF AT LEAST THESE FOLLOWING  
23 PEOPLE: HERBIE PARKHOUSE, DAVID GAIMAN, MO BUDLONG, AND  
24 DUKE SNYDER.

25 Q COULD WE SIMPLY REFER TO THEM AS THE DC 9 AND  
26 UK2? WOULD THAT BE AN ACCURATE DESCRIPTION?

27 A I THINK SO.

28 THERE MAY BE MORE. LET'S SEE. NIKKI MERWIN,

1 RICK MERWIN, JIMMY MILLIGAN, ANNE MULLIGAN.

2 Q NOW, OF THE PEOPLE YOU JUST NAMED, WHO HAVE YOU  
3 PERSONALLY MET OR DO YOU KNOW?

4 A HERBIE PARKHOUSE, DAVID GAIMAN, MO BUDLONG,  
5 JANE KEMBER, NIKKI MERWIN, RICK MERWIN, JIMMY MULLIGAN, ANNE  
6 MULLIGAN, HENNING HELDT.

7 THERE MAY BE MORE. I DON'T KNOW.

8 Q DO YOU CONTEND THAT ANY OF THESE PEOPLE HAVE  
9 IMPLEMENTED THE FAIR-GAME PROGRAM OR POLICY AGAINST YOU?

10 A NOT THAT I KNOW OF.

11 Q DO YOU CONTEND THAT ANY OF THESE INDIVIDUALS  
12 THEMSELVES HAVE BEEN THE VICTIM OF FAIR GAME?

13 A I DON'T KNOW.

14 Q DO YOU CONTEND THAT ANY OF THESE INDIVIDUALS IN  
15 ANY MANNER WHATSOEVER SINCE DECEMBER 12, 1981, HAVE  
16 HARASSED YOU OR MEMBERS OF YOUR FAMILY?

17 A NO.

18 Q DO YOU KNOW WHAT THE OUTCOME OF THAT COMMITTEE OF  
19 EVIDENCE THAT WE'RE TALKING ABOUT WAS AS TO THESE INDIVIDUALS?

20 A BROADLY.

21 Q AND WHAT IS THAT?

22 A EACH OF THEM WAS GIVEN SOME KIND OF DEMOTION  
23 EITHER IN RANK, POSITION, OR REMOVAL FROM STAFF.

24 Q DO YOU CONTEND THAT AT ANY TIME SINCE DECEMBER 12,  
25 1981, ANY CONFIDENTIAL MATERIAL CONTAINED IN AN AUDITING OR  
26 PRE-CLEAR OR ANY OTHER KIND OF CONFIDENTIAL FILE HAS BEEN  
27 DISSEMINATED CONCERNING YOU?

28 A EXCUSE ME?

1 Q DO YOU CONTEND THAT ANY CONFIDENTIAL INFORMATION  
2 CONTAINED IN A PRE-CLEAR, AUDITING, OR OTHER CONFIDENTIAL-TYPE  
3 PROCESSING FILE HAS BEEN DISSEMINATED CONCERNING YOU?

4 A I DON'T KNOW.

5 Q SAME QUESTION AS TO ANY MEMBER OF YOUR FAMILY  
6 THAT HAS BEEN INVOLVED IN SCIENTOLOGY.

7 A AND WHAT WOULD THAT QUESTION BE RELATIVE TO  
8 THAT?

9 Q DISSEMINATION OF CONFIDENTIAL COMMUNICATIONS  
10 CONTAINED IN AUDITING, PRE-CLEAR, OR OTHER CONFIDENTIAL  
11 FILES.

12 A I DON'T KNOW.

13 Q YOU ARE NOT AWARE OF ANYONE HAVING TOLD YOU ABOUT  
14 SUCH INFORMATION HAVING BEEN DISSEMINATED; IS THAT CORRECT?

15 A THAT'S CORRECT.

16 Q YOU HAVEN'T SOLD ANY MATERIALS THAT WERE  
17 CONTAINED IN THE ARCHIVES PROJECT FOR YOUR OWN PERSONAL  
18 BENEFIT OR PROFIT?

19 A NO.

20 Q DO YOU KNOW WHY OMAR GARRISON WANTED MULTIPLE  
21 COPIES MADE OF SOME FILES?

22 A YOU WILL HAVE TO BE MORE EXPLICIT ABOUT THAT.

23 Q YESTERDAY YOU TESTIFIED THAT ON OCCASION  
24 MR. GARRISON REQUESTED THAT YOU MAKE MULTIPLE COPIES OF SOME  
25 DOCUMENTS.

26 DO YOU HAVE ANY IDEA OR INFORMATION AS TO WHY  
27 HE WOULD REQUIRE MULTIPLE COPIES OF SOME DOCUMENTS?

28 A WHAT TIME PERIOD ARE WE REFERRING TO?

1 Q THE TIME PERIOD THAT YOU HAVE BEEN ASSOCIATED  
2 WITH MR. GARRISON SINCE ABOUT JANUARY 1980.

3 A ALL RIGHT.

4 Q WHAT WAS THAT PURPOSE FOR MULTIPLE COPIES?

5 A HE FELT THAT THE ORGANIZATION WOULD NOT ALLOW  
6 HIM TO COMPLETE THE BIOGRAPHY AND THAT THERE WAS A CHANCE  
7 THAT HIS HOUSE WOULD BE BURGLARIZED AND THAT THE MATERIALS,  
8 RESEARCH MATERIALS, WHICH HE HAD IN ORDER TO DO THE BIOGRAPHY  
9 WOULD BE STOLEN.

10 Q ON EACH OCCASION SINCE DECEMBER 12, 1981, THAT  
11 YOU HAVE MADE COPIES FOR MR. GARRISON, HAS HE REIMBURSED  
12 YOU FOR ALL EXPENSE IN COPYING THOSE DOCUMENTS?

13 A NO.

14 Q APPROXIMATELY HOW MUCH HAS HE REIMBURSED YOU?

15 A \$75.

16 Q APPROXIMATELY HOW MUCH EXPENSE HAS BEEN INCURRED  
17 BY YOURSELF IN COPYING DOCUMENTS?

18 A \$200.

19 Q DO YOU HAVE ANY UNDERSTANDING WITH MR. GARRISON  
20 CONCERNING THE REIMBURSEMENT OF THAT APPROXIMATELY \$125  
21 THAT YOU HAVE NOT YET BEEN REIMBURSED?

22 A HE HAS EXPRESSED THAT HE WANTS TO REIMBURSE ME  
23 FOR IT ALL.

24 Q HAVE YOU OFFERED TO ACCEPT ANY REIMBURSEMENT  
25 THAT HE HAS OFFERED YOU?

26 A NOT RECENTLY.

27 Q AND WHY IS THAT?

28 A BECAUSE I FEEL THAT HE'S FINANCIALLY NOT WELL OFF.

1 Q HAS ANYBODY AT ANY POINT IN TIME SINCE  
2 DECEMBER 12, 1981, MADE ANY STATEMENT TO YOU CONCERNING  
3 COMPENSATION THAT YOU MIGHT RECEIVE BECAUSE OF SOME OF THE  
4 DOCUMENTS WITHIN YOUR CUSTODY, CONTROL OR POSSESSION?

5 MS. DRAGOJEVIC: OBJECTION. THE QUESTION IS VAGUE AND  
6 AMBIGUOUS. I DON'T UNDERSTAND WHAT YOU MEAN BY "COMPENSATION"  
7 OR IN WHAT CONTEXT YOU MEAN IT.

8 Q BY MR. KOHLWECK: HAS ANYONE SAID TO YOU YOU  
9 COULD MAKE A LOT OF MONEY WITH THE DOCUMENTS WITHIN YOUR  
10 CUSTODY AND CONTROL?

11 A NO.

12 Q NO ONE?

13 A NO.

14 Q WHEN WAS THE LAST TIME YOU TALKED TO VIRGIL  
15 WILHITE?

16 A APPROXIMATELY APRIL 24TH.

17 Q AND WHAT IS SIGNIFICANT ABOUT APRIL 24TH?

18 A I, ON OR ABOUT THAT DATE, WENT TO VIRGIL'S  
19 PLACE TO REQUEST BACK THE PHOTOGRAPHS WHICH HE HAD DELIVERED  
20 TO -- WHICH HE CLAIMED HE TURNED OVER TO THE ORGANIZATION.

21 MR. KOHLWECK: ALL RIGHT. I AM DONE WITH THE SET OF  
22 QUESTIONS I HAD. NOW, LET'S CLEAR UP THE PRIVILEGED AREA  
23 AND GET DONE HERE.

24 MS. DRAGOJEVIC: THE REPORTER INDICATED IT SHOULDN'T  
25 TAKE HIM TOO LONG TO FIND THOSE QUESTIONS. I ASKED HIM ON  
26 ONE OF THE BREAKS.

27 MR. KOHLWECK: I WILL RECONSTRUCT THEM VERY QUICKLY  
28 MENTALLY WITHOUT WASTING THE TIME.

1 MS. DRAGOJEVIC: GOOD. WONDERFUL.

2 Q BY MR. KOHLWECK: MR. ARMSTRONG, ON WHAT  
3 OCCASIONS HAVE YOU SENT EITHER ORIGINAL OR COPIES OF DOCUMENTS  
4 TO MR. MICHAEL FLYNN'S OFFICE?

5 A TO MY RECOLLECTION, SOMETIME IN MAY, SOMETIME IN  
6 JUNE, SOMETIME IN JULY, AND ONCE IN AUGUST.

7 Q NOW, BY YOUR RECITATION THERE, DO YOU MEAN ONCE  
8 DURING THE MONTHS OF MAY, JUNE, JULY, AND AUGUST, OR ON MORE  
9 THAN ONE OCCASION DURING EACH ONE OF THOSE MONTHS?

10 A TO MY RECOLLECTION, THERE WERE FOUR TIMES WHEN I  
11 SENT COPIES OR ORIGINALS OF DOCUMENTS TO MR. FLYNN. THERE  
12 MAY BE FIVE. BUT IT IS IN THAT AREA.

13 Q IN TERMS OF NUMBER OF PAGES, HOW MANY PAGES OF  
14 ORIGINAL DOCUMENTS HAVE YOU SENT TO MR. FLYNN?

15 A I'D ESTIMATE 3,000.

16 Q APPROXIMATELY HOW MANY PAGES OF ORIGINAL  
17 DOCUMENTS DID YOU SEND TO MR. FLYNN IN APRIL?

18 A I SAID ALTOGETHER.  
19 THE FIRST QUESTION WAS ALTOGETHER?

20 Q YES.

21 A AND NOW WE ARE TALKING ABOUT APRIL?

22 MS. DRAGOJEVIC: OBJECTION. HE NEVER STATED THAT HE  
23 SENT ANYTHING TO MR. FLYNN IN APRIL.

24 Q BY MR. KOHLWECK: DID YOU SEND ANYTHING TO  
25 MR. FLYNN IN APRIL?

26 A I DON'T BELIEVE SO.

27 Q LET'S MAKE THAT MAY, THEN.

28 APPROXIMATELY HOW MANY PAGES OF ORIGINAL



1 DOCUMENTS DID YOU SEND TO MR. FLYNN IN MAY?

2 A NONE THAT I RECALL.

3 Q SAME QUESTION, IN JUNE.

4 A PERHAPS 200 OR 300.

5 Q AND JULY?

6 A AGAIN, ABOUT THE SAME, A FEW HUNDRED.

7 Q AND AUGUST?

8 A PERHAPS 2,000.

9 Q WE'VE BEEN TALKING ABOUT ORIGINAL DOCUMENTS SO  
10 FAR.

11 A THAT'S CORRECT.

12 Q THE SAME QUESTION NOW AS TO COPIES OF DOCUMENTS.

13 IN TOTAL, HOW MANY PAGES OF COPIES OF DOCUMENTS

14 HAVE YOU PROVIDED TO MR. FLYNN?

15 A IN THE NEIGHBORHOOD OF 5,000.

16 Q HOW MANY IN MAY, APPROXIMATELY?

17 A 4,000.

18 Q AND HOW MANY IN JUNE?

19 A A COUPLE HUNDRED.

20 Q AND HOW MANY IN JULY?

21 A A COUPLE HUNDRED.

22 Q AND HOW MANY IN AUGUST?

23 A ABOUT THE SAME; 300, 400.

24 Q AND IS THE SOURCE OF ALL THESE COPIES, DOCUMENTS  
25 THAT YOU BORROWED FROM MR. GARRISON TO COPY?

26 A YES.

27 Q NOW, SAME QUESTION AGAIN.

28 HOW MANY ORIGINAL DOCUMENTS HAVE BEEN PROVIDED TO

1 THE LAW OFFICES OF BUNCH & CONTOS?

2 MS. DRAGOJEVIC: CONTOS & BUNCH.

3 MR. KOHLWECK: CONTOS & BUNCH. EXCUSE ME.

4 THE WITNESS: I WOULD SAY 2,000.

5 Q BY MR. KOHLWECK: WHEN WAS THE EARLIEST PROVIDED  
6 TO THAT OFFICE?

7 A TO MY RECOLLECTION, IT WAS SOMETIME IN JULY.

8 Q AND HOW MANY DOCUMENTS, ORIGINAL DOCUMENTS, WERE  
9 PROVIDED DURING THE MONTH OF JULY TO THAT OFFICE?

10 A THAT IS WHAT I JUST SAID, A COUPLE THOUSAND.

11 Q AND HOW MANY IN AUGUST?

12 A I BELIEVE NONE.

13 Q SAME QUESTION AS TO COPIES OF DOCUMENTS.

14 WHEN IS THE FIRST TIME COPIES OF DOCUMENTS WERE  
15 PROVIDED TO CONTOS & BUNCH?

16 A IN JULY.

17 Q AND HOW MANY COPIES, APPROXIMATELY, WERE PROVIDED  
18 IN JULY?

19 A MY RECOLLECTION, APPROXIMATELY 400.

20 Q IN AUGUST?

21 A I BELIEVE 20.

22 Q AND AS TO THESE DOCUMENTS THAT WE IDENTIFIED  
23 THIS MORNING, YOU IDENTIFIED SEVERAL DIFFERENT CATEGORIES OF  
24 DOCUMENTS THAT YOU HAD ORIGINALS OF.

25 A YES.

26 Q ALL OF THOSE CATEGORIES HAVE BEEN DISTRIBUTED  
27 EITHER TO THE OFFICES OF CONTOS & BUNCH OR THE LAW OFFICES  
28 OF MICHAEL FLYNN; IS THAT CORRECT?

1 A WE'RE GOING TO HAVE TO CLARIFY SOMETHING HERE.

2 Q OKAY.

3 A YOU MEAN ALL OF THE ORIGINAL DOCUMENTS THAT WE  
4 ARE -- THAT I EVER DELIVERED AT ANY TIME TO OMAR GARRISON?  
5 IS THAT WHAT WE'RE TALKING ABOUT?

6 Q NO. ALL OF THE DOCUMENTS, ORIGINAL DOCUMENTS,  
7 THAT REMAIN UNDER YOUR CONTROL BECAUSE THEY ARE IN THE  
8 POSSESSION OF YOUR ATTORNEYS RIGHT NOW.

9 A YES.

10 Q ALL OF THOSE CATEGORIES YOU DEFINED FOR ME THIS  
11 MORNING ARE IN THE POSSESSION OF YOUR ATTORNEYS; IS THAT  
12 CORRECT?

13 A YES.

14 Q AND NO OTHER PERSON HAS POSSESSION OF ANY OF  
15 THOSE DOCUMENTS; IS THAT CORRECT?

16 A YES.

17 MS. DRAGOJEVIC: MAY I CONFER WITH MY CLIENT FOR A  
18 MOMENT?

19 MR. KOHLWECK: CERTAINLY.

20 MS. DRAGOJEVIC: LET'S STEP OUT A SECOND.

21 (BRIEF RECESS.)

22 Q BY MR. KOHLWECK: MR. ARMSTRONG, IS THERE ANY  
23 PATTERN TO THE ORIGINAL DOCUMENTS THAT YOU HAVE TRANSMITTED  
24 TO THE LAW OFFICES OF MICHAEL FLYNN AS OPPOSED TO THE OFFICES  
25 OF CONTOS & BUNCH?

26 A NO.

27 Q CAN YOU RECALL WHAT ORIGINAL DOCUMENTS YOU HAVE  
28 SENT TO THE OFFICES OF CONTOS & BUNCH?

1           A           THEY WERE A RANDOM ASSORTMENT.  THERE WERE  
2           SOME HUBBARD EXPLORATIONAL DOCUMENTS; AND OTHER THAN THAT,  
3           IT WAS A VERY RANDOM ASSORTMENT.

4           Q           WITHIN THAT RANDOM ASSORTMENT, DO YOU BELIEVE  
5           THAT THOSE DOCUMENTS WILL ILLUSTRATE INACCURACIES OR  
6           MISREPRESENTATIONS CONCERNING MR. HUBBARD'S LIFE AND  
7           ACCOMPLISHMENTS?

8           A           I CAN'T ANSWER THAT; BY WHICH I MEAN I DON'T  
9           HAVE THE ANSWER TO THAT.

10          Q           CAN YOU DESCRIBE THE DOCUMENTS, ORIGINAL  
11          DOCUMENTS, YOU HAVE SENT TO MR. FLYNN'S OFFICE?

12          A           I BELIEVE I'VE DONE THAT AS WELL AS I COULD.  
13          THEY WERE --

14          Q           THIS MORNING WE DESCRIBED THE WHOLE CATEGORY  
15          OF DOCUMENTS, BUT WE DIDN'T TALK ABOUT THE DIVISION OF  
16          WHO HAD WHAT.  AND THAT IS WHAT I'M TRYING TO ESTABLISH  
17          RIGHT NOW.

18          A           OKAY.

19                       WHAT I SENT TO MR. FLYNN WERE PRINCIPALLY  
20          HUBBARD EXPLORATIONAL COMPANY DOCUMENTS, DOCUMENTS ON  
21          SHIPS, MR. HUBBARD'S YACHTS, AND THERE WERE SOME DOCUMENTS  
22          FROM -- HAVING TO DO WITH PUBLIC RELATIONS AT SAINT  
23          HILL.

24          Q           AND THE ACQUISITION OF SAINT HILL?

25          A           I BELIEVE SO.

26          Q           AND DOCUMENTS PERTAINING TO THE TRANSFER OF FUNDS  
27          AMONG VARIOUS SCIENTOLOGY ORGANIZATIONS?

28          A           I DON'T RECALL THOSE.

1 Q ARE THERE ANY OTHER DOCUMENTS THAT YOU DO  
2 RECALL?

3 A THAT IS PRINCIPALLY IT.

4 Q AND I BELIEVE THE LAST AREA OF QUESTIONS WHERE  
5 THE PRIVILEGE WAS ASSERTED WAS WHEN I ASKED IF MR. WILHITE  
6 HAD APPRAISED ANY OF THESE ORIGINAL DOCUMENTS AT ANY  
7 POINT IN TIME, TO THE BEST OF YOUR KNOWLEDGE.

8 A NONE OF THESE.

9 Q ARE ANY OF THESE DOCUMENTS SIMILAR TO ANY OTHER  
10 DOCUMENTS THAT MR. WILHITE DID APPRAISE?

11 MS. DRAGOJEVIC: OBJECTION; VAGUE AND AMBIGUOUS.

12 Q BY MR. KOHLWECK: DO YOU UNDERSTAND WHAT THE  
13 WORD "SIMILAR" MEANS?

14 A YES.

15 Q DO YOU HAVE ANY DIFFICULTY UNDERSTANDING MY  
16 QUESTION?

17 A PERHAPS YOU COULD RESTATE IT.

18 Q ARE ANY OF THE DOCUMENTS THAT YOU HAVE PROVIDED  
19 TO YOUR ATTORNEYS, ORIGINAL DOCUMENTS, COMPARABLE TO OTHER  
20 DOCUMENTS THAT MR. WILHITE HAS APPRAISED IN VALUE?

21 MS. DRAGOJEVIC: OBJECTION. IT IS STILL VAGUE AND  
22 AMBIGUOUS.

23 MR. KOHLWECK: ALL RIGHT. LET'S BE SPECIFIC.

24 Q IN THE DOCUMENTS THAT YOU HAVE PROVIDED TO YOUR  
25 ATTORNEYS, ORIGINAL DOCUMENTS, IT IS MY UNDERSTANDING THAT  
26 SOME OF THOSE ARE DOCUMENTS PERSONALLY AUTHORED BY  
27 MR. HUBBARD; IS THAT CORRECT?

28 A YES.

1 Q HAS MR. WILHITE AT ANY TIME GIVEN ANY ESTIMATE  
2 OF VALUE, TO THE BEST OF YOUR KNOWLEDGE, OF ANY DOCUMENT  
3 AUTHORED BY MR. HUBBARD?

4 A YES.

5 Q HAS HE EVER GIVEN AN ESTIMATE ON A SINGLE-PAGE  
6 LETTER SIGNED BY MR. HUBBARD?

7 A I DON'T RECALL.

8 Q DO YOU RECALL IF MR. WILHITE AT ANY TIME SAID  
9 ANY DOCUMENT OF WHATEVER CONTENTS, PERSONALLY AUTHORED BY  
10 MR. HUBBARD HAS A MINIMUM VALUE TO COLLECTORS? HAS HE EVER  
11 MADE A STATEMENT SUCH AS THAT TO YOU?

12 A NOT THAT EXACT STATEMENT.

13 Q WHAT HAS HE SAID TO YOU?

14 A HE EXPRESSED TO ME THAT ORIGINAL DOCUMENTS HAVE  
15 MONETARY VALUE.

16 Q DID HE GIVE YOU ANY INDICATION AS TO THE SIZE OF  
17 THE VALUE?

18 A I DON'T RECALL EVER SEEING OR HEARING ANYTHING  
19 EXPLICIT LIKE THAT.

20 Q AND I BELIEVE I ASKED YOU IF HE EVER PERFORMED  
21 AN APPRAISAL OF CERTAIN PROPERTY IN THE POSSESSION OF  
22 BARBARA SNADER, AND A FIFTH AMENDMENT PRIVILEGE WAS  
23 ASSERTED.

24 MS. DRAGOJEVIC: I BELIEVE I ALLOWED HIM TO ANSWER THAT  
25 QUESTION.

26 MR. KOHLWECK: MY RECOLLECTION IS BLOCKED. DO YOU  
27 MIND IF I REASK IT? IT IS ONLY FOR THAT PURPOSE.

28 MS. DRAGOJEVIC: ALL RIGHT.

1 THE WITNESS: I DON'T RECALL THAT APPRAISAL.

2 Q BY MR. KOHLWECK: MR. ARMSTRONG, HAVE YOU  
3 REVIEWED ANY DOCUMENTS WHATSOEVER IN PREPARATION FOR THE  
4 DEPOSITION OF YESTERDAY AND TODAY?

5 A NO.

6 Q OR ANY MATERIALS WHATSOEVER?

7 A NO.

8 MR. KOHLWECK: I HAVE NO FURTHER QUESTIONS.

9 MS. DRAGOJEVIC: I HAVE NO QUESTIONS.

10 MR. KOHLWECK: MIGHT WE GO OFF THE RECORD FOR A  
11 SECOND?

12 MS. DRAGOJEVIC: YES.

13 (DISCUSSION OFF THE RECORD.)

14 MR. KOHLWECK: THE COURT REPORTER IS RELIEVED OF HIS  
15 RESPONSIBILITY UPON TRANSMISSION OF THE ORIGINAL COPY TO  
16 MS. DRAGOJEVIC'S OFFICE; THAT UPON RECEIPT, THE DEPONENT  
17 WILL HAVE 30 DAYS TO REVIEW AND VERIFY THE DEPOSITION, AND  
18 HE MAY DO SO EITHER BEFORE A NOTARY OR UNDER DECLARATION OF  
19 PENALTY OF PERJURY; THAT IF IT IS NOT SO VERIFIED WITHIN  
20 30 DAYS OF RECEIPT, A COPY MAY BE USED AS THOUGH IT WERE A  
21 VERIFIED ORIGINAL.

22 MS. DRAGOJEVIC: ALL RIGHT. I WOULD LIKE 60 DAYS IN  
23 WHICH TO DO THAT, SINCE WE JUST DISCUSSED OFF THE RECORD  
24 THAT IF MR. ARMSTRONG WANTS TO CHANGE ANY OF HIS TESTIMONY  
25 PRIOR TO OUR FILING OPPOSITION TO THE TEMPORARY RESTRAINING  
26 ORDER PAPERS, HE MAY. BUT I WOULD LIKE 60 DAYS, IN ANY  
27 EVENT, RATHER THAN 30 DAYS. IT IS NOT GOING TO MAKE THAT  
28 MUCH DIFFERENCE.

1 MR. KOHLWECK: ALL RIGHT. WHY DON'T WE CLARIFY OUR  
2 STIPULATION, THEN.

3 BECAUSE OF THE HEARING ON THE PRELIMINARY  
4 INJUNCTION WHICH IS SCHEDULED FOR AUGUST 24, 1982, AND  
5 BECAUSE OF THE FACT THAT PLAINTIFF'S MOVING PAPERS HAVE TO  
6 BE FILED OFFICIALLY WITH THE COURT ON OR BEFORE SEPTEMBER 9TH,  
7 THE PROCEDURE THAT COUNSEL AND I HAVE AGREED TO IS I WILL  
8 USE DEPOSITION TESTIMONY, IF I CHOOSE TO, IN MY MOVING  
9 PAPERS, AND SHE WILL HAVE THE OPPORTUNITY TO ALLOW  
10 MR. ARMSTRONG IN HER RESPONSIVE PAPERS TO CORRECT ANY  
11 STATEMENT THAT HE MAY WISH TO CORRECT IN THE QUOTED  
12 DEPOSITION TESTIMONY. I WILL RESERVE MY RIGHT TO COMMENT  
13 UPON ANY CHANGES SO MADE AT THE TIME OF HEARING.

14 MS. DRAGOJEVIC: AND IF HE DOES NOT MAKE ANY CHANGES  
15 BY THE TIME OF THE HEARING OF THE TEMPORARY RESTRAINING  
16 ORDER, THAT DOES NOT BAR HIM FROM MAKING CHANGES WITHIN THE  
17 60-DAY PERIOD THAT WE HAVE SPECIFIED.

18 MR. KOHLWECK: IT DOES NOT BAR HIM FROM MAKING CHANGES,  
19 BUT I MAY ARGUE WE HAVE A JUDICIAL ADMISSION AT THAT POINT  
20 IN TIME.

21 MS. DRAGOJEVIC: AT WHAT POINT IN TIME?

22 MR. KOHLWECK: AT THE POINT IN TIME THAT THE STATEMENT  
23 GOES UNCONTROVERTED.

24 MS. DRAGOJEVIC: ARE YOU SAYING THAT AFTER THE T.R.O.  
25 HEARING --

26 CAN WE GO OFF THE RECORD FOR A MINUTE?

27 MR. KOHLWECK: YES.

28 (DISCUSSION OFF THE RECORD.)



1 MR. KOHLWECK: ONE LAST STATEMENT, AND THAT IS THAT I  
2 HAVE AND WILL AGAIN ASK THE COURT REPORTER TO SPECIALLY  
3 EXPEDITE A PORTION OF THE TRANSCRIPT WHICH OCCURRED ABOUT  
4 A HALF AN HOUR BEFORE WE TOOK OUR LUNCH BREAK TODAY, AND  
5 OF COURSE COPIES WILL BE PROVIDED TO OPPOSING COUNSEL OF  
6 THAT PORTION.

7 MS. DRAGOJEVIC: SO STIPULATED.  
8  
9

10 I DECLARE UNDER PENALTY OF  
11 PERJURY THAT THE FOREGOING IS TRUE  
12 AND CORRECT.

13 EXECUTED THIS \_\_\_\_\_ DAY OF

14 \_\_\_\_\_, 1982, AT

15 \_\_\_\_\_, CALIFORNIA.  
16  
17

18 \_\_\_\_\_  
19 GERALD DAVID ARMSTRONG  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 STATE OF CALIFORNIA )  
2 COUNTY OF LOS ANGELES ) SS.

3  
4 I, GREGORY R. ADELSON, CSR NO.1873, RPR , A NOTARY PUBLIC  
5 IN AND FOR THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, DO  
6 HEREBY CERTIFY:

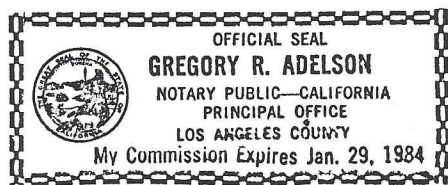
7 THAT PRIOR TO BEING EXAMINED, THE WITNESS NAMED IN THE  
8 FOREGOING DEPOSITION, TO WIT, GERALD DAVID ARMSTRONG ,  
9 WAS BY ME DULY SWORN TO TESTIFY THE TRUTH, THE WHOLE TRUTH,  
10 AND NOTHING BUT THE TRUTH;

11 THAT SAID DEPOSITION WAS TAKEN BEFORE ME AT THE TIME  
12 AND PLACE THEREIN SET FORTH AND WAS TAKEN DOWN BY ME IN  
13 SHORTHAND AND THEREAFTER TRANSCRIBED INTO TYPEWRITING UNDER  
14 MY DIRECTION AND SUPERVISION, AND I HEREBY CERTIFY THE  
15 FOREGOING DEPOSITION IS A FULL, TRUE AND CORRECT TRANSCRIPT  
16 OF MY SHORTHAND NOTES SO TAKEN.

17 I FURTHER CERTIFY THAT I AM NEITHER COUNSEL FOR NOR  
18 RELATED TO ANY PARTY TO SAID ACTION NOR IN ANYWISE INTERESTED  
19 IN THE OUTCOME THEREOF.

20 I FURTHER CERTIFY THAT IT WAS STIPULATED BY COUNSEL  
21 THAT SAID DEPOSITION MAY BE READ, CORRECTED AND SIGNED BY THE  
22 WITNESS UNDER PENALTY OF PERJURY.

23 IN WITNESS WHEREOF, I HAVE HEREUNTO SUBSCRIBED MY NAME  
24 AND AFFIXED MY OFFICIAL SEAL THIS 26<sup>TH</sup> DAY OF August,  
25 1982.



26  
27 *Gregory R Adelson*  
28 NOTARY PUBLIC IN AND FOR THE COUNTY  
OF LOS ANGELES, STATE OF CALIFORNIA

Gregory R. Adelson, CSR NO. 187  
 Witness G. ARMSTRONG

Calvert 406

X P.F. Calvert RHCALVERT

STREET 6430 SUNSET BLVD.

CITY LOS ANGELES STATE CA

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 CARSON CITY, NEVADA 89701



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11/5	32.00	1.60			33.60				
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\$ 178.42

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OTHER			
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STATE		TOTAL \$	

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